



Bobcat Gas Storage

Excerpts from Bobcat's
Operator Qualification Program
(for Bobcat contractor use)

(Effective November 1, 2008)

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1. Overview

Scope The U.S. Department of Transportation (DOT), Pipeline Hazardous Material Safety Administration (PHMSA), requires pipeline operators to develop a written qualification program to evaluate the ability of employees and contractors to perform “covered tasks” and to recognize and respond to abnormal operating conditions that may be encountered while performing these activities. Design and engineering tasks are excluded because assurance of their quality is provided by the fact that appropriately educated or experienced individuals perform these tasks using guidelines and procedures for the conduct of their work. In addition, the quality of the work product is generally confirmed procedurally through review and ultimately by field inspection and testing of the design.

Bobcat Gas Storage Operator Qualification program will be revised as regulations change, and when new information, or experiences with the plan are encountered. The OQ Coordinator will review the plan on an annual basis. This is a performance-based qualification program. The regulations can be found in 49 CFR Part 192 Subpart N (gas).

The Company’s OQ program is designed to ensure that all individuals working on the Company’s regulated pipeline facilities are qualified to perform specific “covered tasks” and to reduce the probability and consequences of incidents/accidents.

- Important Dates**
- October 27, 1999 – Individuals who were performing a covered task(s) on a regular basis prior to this date will attain the level of transitional qualification for that specific task(s) by a satisfactory review of work performance history. All other Individuals must complete an initial qualification prior to performing any covered task(s) after this program has been approved by BP.
 - October 28, 2002 – All Individuals must be qualified.
 - October 29, 2002- Work performance history review cannot be used as the sole method of evaluation.
 - December 17, 2002-Pipeline Safety Improvement Act enactment date.
 - December 17, 2004-Pipeline Safety Improvement Act compliance date.
 - September 15, 2006 – Publish date of the ASME B31Q Standard

Who is affected? All Operations and Maintenance personnel, which include company and contract field personnel and Control Center personnel, performing Covered Tasks on DOT regulated facilities are affected.



2. Premises and Definitions

- Covered Task** An activity by an individual or group of individuals that (a) is performed on a pipeline facility **and**; (b) is an Operations or Maintenance task **and**; (c) is required by Part 192 or Part 195; and (d) affects the operation or integrity of the pipeline.
- Performed on a Pipeline Facility** Performed on a pipeline facility - an activity that is performed by an individual or group of individuals whose performance directly impacts the pipeline facility.
- A. Pipeline Facility is new and existing pipe, rights-of-way and any equipment, facility or building used in the transportation of hazardous liquid or gas.
 - B. Activity means physical, visual or mental effort directed at achieving a result.
 - C. Removed from the system means that a part of the pipeline system is physically removed or isolated from the pipeline system.
 - D. Pipeline System means all parts of a pipeline facility through which a hazardous liquid or gas moves in transportation (line pipe, valves, appurtenances, pumps, compressors, meters, tanks, etc).
- Operations and Maintenance Tasks** Activities done by an individual or group of individuals (1) to perform a function on a pipeline facility; or, (2) to provide upkeep of a pipeline facility.
- A. A “new construction task” changes to an Operations and Maintenance task when the pipeline facility is being commissioned or during the act of connecting to an active pipeline facility.
 - B. New construction means the act of building a pipeline facility, or expanding an existing pipeline facility (as in looping a pipeline segment, which may also be done to meet increased load requirements or to enhance reliability of the system) in order to provide new service to a customer(s) or in order to meet increased demand.
 - C. Fabrication of new elements installed as part of a maintenance/repair or “replace in kind” activity are Operations and Maintenance tasks.
 - D. Emergency response activities are not Operations and Maintenance tasks.
 - E. Activities on pipelines that have never been in service or fabrication of new installations associated with new functions or services are not Operations and Maintenance tasks.
- Required by Part 192/195** Required by Part 192/195 - only those tasks specifically required to be addressed in Parts 192/195. State and local requirements are not applicable to this rule.



Affects the Operation or Integrity of the Pipeline

Affects the operation or integrity of the pipeline - activity that could directly or indirectly cause the release of hazardous liquid or gas to the environment or result in a hazard to persons or property.

- a. Pipeline means all parts of a pipeline facility through which hazardous liquids or gas move in transportation (line pipe, valves, appurtenances, pumps, compressors, meters, tanks, etc.)
- b. An affect can be either immediate (direct) or delayed (indirect)
- c. The integrity of the pipeline refers to the pipeline’s ability to operate safely and to withstand stresses imposed during operations.

Evaluation

Evaluation - a process established and documented by the Company, to determine whether an individual is qualified to perform a covered task.

Qualified

An individual has been evaluated and

- Can perform assigned covered tasks
- Can recognize and react to Abnormal Operating Conditions that exist for the covered task for which the individual is evaluated and that result from or are encountered during performance of a covered task.
- Regulatory Compliance documentation has been completed

Individual

A person, who on behalf of the Company performs one or more covered tasks on a pipeline facility operated by the Company.

Operate

Start, stop, open, close and monitor.

Element

Activities that are part of a covered task. The list of elements in the OQ Plan are not intended to be all inclusive and could vary by location.

Abnormal Operating Condition

A condition identified by the Company that may indicate a malfunction of a component or deviation from normal operations that may indicate an operating condition that could exceed design limits or result in hazard (s) to persons, property, or the environment.

NOTE: A deviation from normal operation does not necessarily mean an abnormal operating condition exists as long as conditions are within the parameters identified by the Company



5. Contractor Qualification

Performing Covered Tasks Effective November 1, 2008, the Company requires contractors to furnish qualified individuals to perform the Company's covered tasks. The contractor must use a process for evaluation and records retention that is acceptable to the Company's OQ Plan Administrator and in accordance with 49 CFR Part 192.807 or 195.507. During the planning and/or execution stages of each job, the Company's representative in charge of the job will:

- Identify any covered tasks to be performed using the Project Manager's Project OQ Covered Task Checklist (see Attachment 1).

Contractor OQ Action Plan Each Contractor performing covered tasks on Bobcat property must have an Action Plan (see Attachment 2) that is compatible with Bobcat's OQ Program. Before a Contractor's personnel may perform a covered task on Bobcat's pipeline facility, Bobcat will approve the Contractor's OQ action plan by:

- Reviewing the Contractor's OQ action plan to ensure it complies with Bobcat's OQ Program and
- Verifying that the Contractor has identified the covered tasks that their employees will be performing for Bobcat and
- Verifying that the OQ qualified Contractor's employees are included in the Contractor's OQ action plan.

Once the Contractor's OQ action plan has been approved by Bobcat, the Contractor has several options to enable their employees to perform covered tasks for Bobcat including:

- Qualification of their employees through a third party vendor approved by the Bobcat OQ Coordinator. A list of approved vendors is detailed in the Action Plan (see Attachment 2).
- Provide Contractor's employees who are OQ Qualified and can be direct and observe an OQ non-qualified individual perform that covered task, under the span of control detailed in the covered task list (see Attachment 3), including provisions for communication with workers who speak and comprehend languages other than English either directly through the use of a contractor provided translator.

The following two options are only available in rare circumstances and must be approved. In writing, by Bobcat's OQ Coordinator before the Contractor will be allowed to utilize them.

- Qualification of their employees through the Contractor's in-house evaluation process, including in-house evaluators that are either qualified in the covered task being evaluated or are subject matter experts in the covered task.
- Have the Contractor's employee pass Bobcat's evaluation.



**Contractor
Record
Keeping**

Record keeping for Contractors' employees' OQ qualifications must be accessible by Bobcat personnel at any time and shall be maintained at the jobsite.
