Department of Transportation
National Pipeline Safety Forum

Panel Discussion – What More Can (and Should) We Do
Allan Bradley, president and CEO, Questar Pipeline, and chairman, Interstate Natural Gas Association of America

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Secretary LaHood, Administrator Quarterman, I am Allan Bradley, president and CEO of Questar Pipeline Company, and chairman of the Interstate Natural Gas Association of America. I want to thank you for the opportunity to appear before you today at this important national forum to discuss energy pipelines and pipeline safety. Also, I want to thank the Secretary for his personal involvement and leadership addressing pipeline safety improvements, frequent and open dialogue with pipeline operators and on-site visits to accident sites.

I would also like to acknowledge the work that the PHMSA team has done this past year to tighten regulation and strengthen pipeline safety. PHMSA accelerated the implementation of new Control Room Management guidelines and initiated an advanced notice of a proposed rulemaking on the adequacy of natural gas transmission safety regulations. Following the San Bruno tragedy, PHMSA issued two timely advisory bulletins on Emergency Response Preparedness and Planning and the Sufficiency of Records and Adequacy of Risk Assessment. Speaking for Questar Pipeline, the advisories helped underscore the importance of Questar's on-going communication with first responders and prompted us to add resources to our engineering department to accelerate the identification and digitization of our pipeline records that support each pipeline's MAOP.

During the earlier panels, we've heard about the performance of the natural gas transmission segment of our nation's energy delivery system and the reasons why accidents have happened in the past. We've heard about safety improvements over the years. But despite those improvements, we still have accidents. And one accident – one loss of life or injury or destroyed property – is one too many.

INGAA and PHMSA share the same goal. Our goal is zero incidents – a perfect record for safety and reliability. We will work hard every day until we achieve this goal.

We've also heard about how the gas transmission segment, through the INGAA trade association, is continuously working to reduce risk and improve our safety record, including the formation of a new Board-level Pipeline Safety Task Force and through the adoption of new guiding principles on pipeline safety. Under the direction of the Pipeline Safety Task Force, we have created four work streams; Stakeholder Communication, Integrity Management Continuous Improvement, Legislative Communication and FERC Communication.

The question now is: How do we move forward from here?

First, we need to continue educating all stakeholders about the importance of energy and our nation's energy realities. We also need to educate about our energy delivery system and about natural gas pipelines – how they work, why we have them and their role in providing energy to consumers. And, as part of this, we need to have a frank discussion about pipeline safety and the responsibilities of all stakeholders in ensuring safety.

Fortunately on this front we are not starting from scratch. The Pipeline Safety Act of 2002 mandated all operators to create and implement a comprehensive public awareness program designed to inform affected audiences how to identify pipelines near them and how to recognize and respond to emergencies should they occur. API RP-1162 was developed through the collaborative efforts of stakeholders and provides a firm foundation on which to build effective outreach efforts. This effort continues to be advanced by the Common Ground Alliance and DOT's November 2011 Pipelines and Informed Planning Alliance (PIPA) Report, another collaborative effort that provides guidance to local communities on how best to plan development along energy transmission pipelines. Let's jump-start PIPA by embracing the recommended practices detailed in the report. We can do this.

Our education efforts will remain broad-based and should start with our industry, including our own employees, our contractors and our suppliers. It needs to include all levels of government – from the federal, to the state to the local. It must intensify to include all first responders, like fire marshals and other emergency officials who not only deal with the aftermath of pipeline accidents but through better awareness and mutual cooperation can aid in preventing accidents before they happen. Perhaps most importantly we must work harder to educate the public at large, especially the millions of people who work, live or play near pipelines. Finally, we should be held accountable to demonstrate that our efforts are effectively raising public awareness and increasing safety.

Second, we must agree on effective risk-based integrity management solutions. In other words, what does an effective risk-based integrity management system look like? We shouldn't rely on a silver bullet or one-size fits all solution to address these threats. Instead, we should be

fact driven, using technically sound consensus standards that take into account the insights gained from operating experience. We need multi-faceted solutions to multi-faceted problems. Successful integrity management systems involve shared responsibility, recognizing the role of the public officials, regulators, emergency responders, operating companies and the public. And most importantly, we need to incorporate best practices and focus resources where they will do the most good in meeting our goal of zero incidents. Together, we can move forward with improved, risk-based integrity management solutions that make tangible progress towards our goal of zero incidents.

To achieve this, we believe lawmakers and regulators need to take a holistic approach to pipeline safety.

This starts with the reauthorization this year of the Pipeline Safety Act. We need a balanced approach to pipeline safety legislation, in which the Congress signals its priorities and the regulators prescribe the solution based on sound engineering, data analysis and input from all stakeholders. It is understandable that members of Congress want solutions that will prevent a repeat of the pipeline accidents we have witnessed in recent months. Still, it is important that this not result in legislative mandates based on incomplete information. Congress *should* set out clear, strong aspirational goals, but they need to let regulators apply technical expertise to develop and implement the guidelines needed to achieve those goals.

Third, we need stronger state and federal excavation damage-prevention measures. April is safe digging month. We want to make every month a safe digging month.

As it stands now, local governments and state highway departments often get exemptions from one-call laws. We need to remove exemptions from state one-call program participation, improve the enforcement of these programs and increase penalties for failure to call 811.

Local lawmakers have a role to play, too, helping where possible to limit development near pipelines.

Though many pipelines were a considerable distance from population centers when they were built, encroachment of housing subdivisions, schools, shopping centers and industrial and business parks has heightened risks. While we cannot change what is done, we can hope to provide guidance that will inform future decisions by local governments when these development questions present themselves.

Finally, the pipeline transmission industry must continue to invest in technology that can reduce risk, like new in-line inspection tools or "smarter pigs" that detect loss of metal in pipeline walls caused by construction flaws or corrosion. We also must take a more comprehensive approach to our widely distributed pipeline safety research strategies. Our industry's R&D efforts have been characterized as anemic. I believe our R&D efforts are so widely distributed across our industry that they go un-noticed. In response, I recommend that the industry, research organizations and government create a pipeline safety technology road map that identifies and prioritizes our research needs. Our best work is done through collaboration. This will contribute to a more efficient commitment of private and public sector resources and funding, as well as a better matching of specific research with the organizations that possess the strongest skill sets for those particular projects. We must do more as an industry to share lessons

learned when we have an incident or a near-miss. We need to share best practices. And we need to invest in and train the next generation of pipeline workers to ensure that safety is a core value in their work each and every day.

Thank you again for the opportunity to appear before you today.