

**MASTER METER
DISTRIBUTION INTEGRITY MANAGEMENT PLAN
(DIMP)
PROCEDURES**

The following procedures are intended to serve as a guideline to assist staff in understanding and accurately filling out our distribution integrity management plan. In order for this plan to be effective, it is vital that all personnel responsible for the implementation of this plan must understand the information contained in this plan and implement the action criterion that is detailed within this plan.

FACILITY NAME AND ADDRESS:

As with the information contained within our operations and maintenance manual, this plan is not in effect until all pertinent information is filled in by the person(s) who are responsible for the operations and maintenance of our gas pipeline system.

DEFINITIONS:

Definitions are provided to assist personnel in evaluating our gas pipeline system.

KNOWLEDGE OF THE DISTRIBUTION SYSTEM:

The purpose of this section is to assist personnel to gain knowledge of our gas pipeline system. It is the intent of our DIMP plan to assure that we, as the operator, know and understand the risks associated with the operation of our gas pipeline system. This section lists several resources available to personnel to acquire the necessary knowledge.

DISTRIBUTION SYSTEM OVERVIEW:

This section provides an overview of our gas pipeline system and also provides documentation to demonstrate that we have acceptable knowledge of our system. In addition, this section provides valuable information that can be used by personnel to assure a smooth transition from staff to staff. Personnel shall review and transfer the information from our current operations and maintenance plan into this section of our plan. Information that is not available in our manual may be found on our annual report that is filed each year with the Arizona Office of Pipeline Safety (“AZOPS”). In the event that necessary information is not available, personnel will be required to determine the piping type and approximate total footage by whatever means possible, including dig and inspect, if needed. Personnel must identify additional information needed and provide a plan for gaining knowledge over time through normal activities conducted on the pipeline (for example, design, construction, operations or maintenance activities)

PLAN IMPLEMENTATION:

List the position (job title) of the person(s) who will be responsible for the maintenance and implementation of this DIMP plan, not the name of the person.

IDENTIFICATION OF THREATS:

This section lists the most common threats associated with our master meter system. It is our responsibility as an operator to determine the threats that are applicable to our gas system. If there are any other specific threats other than those listed in this section that you may believe apply to our system, we shall also evaluate the specific threat(s).

RISK RANKING:

Each threat has an assigned risk ranking score. Risk is determined by the type of piping material in our system (steel and/or plastic), and the leak history for the previous 5 years.

CONSEQUENCE RANKING:

Based upon our priority as determined by the AZOPS our consequence rank will be entered on the consequence line in this section of our DIMP plan.

THREAT ASSESSMENT:

This section identifies various threats to our pipeline system. Each threat shall be given a score that is based on the piping material and the system leak history for the previous 5 years. The scores range from 0 (low risk) to 3 (high risk).

THREAT ASSESSMENT CHART:

Personnel must evaluate each threat to determine if it is applicable to our system; check each box that applies.

Once all the threats have been evaluated and checked, you must add up the scores for each threat checked.

NOTE: If we do not know the material or footages of piping in our system; or if we have experienced five (5) or more hazardous leaks on our system for any reason in the previous five (5) years, our threat probability score will be 3 with only one threat category checked as applicable.

OVERALL RISK RANKING:

The overall risk ranking shall be determined by using the following steps:

Take the total threat score that you determined from the threat assessment chart and multiply the threat score by the consequence score (1.25 for priority 1; 1.0 for priority 2).

Then divide the number determined in the step above by the total number of threat categories identified that were checked (number of categories checked “yes” in the threat assessment chart). This is our final overall risk score for our system.

Each time we evaluate our overall risk ranking we must include the date that each risk ranking was determined.

BASED ON RISK RANKING SCORE THE FOLLOWING ACTIONS WILL BE TAKEN:

The section provides criteria for additional actions to be taken based on our overall system risk ranking. If the overall risk ranking is 1.5 or higher, we will identify the threat(s) that need to be corrected monitor our system and submit a written plan to the Arizona Corporation Commission's Office of Pipeline Safety for evaluation within 30 days. If the overall risk score is less than 1.5, then no additional actions, other than normal operation and maintenance activities and system monitoring, shall be taken.

MANDATORY AND RISK BASED; ADDITIONAL ACTIONS, GENERAL:

Additional identified steps taken are based on annual activities that are specified in our operations and maintenance manual, as well as additional requirements based on the Arizona Administrative Code.

MANDATORY PERFORMANCE MEASURES:

Keep all written records for each leak that is located and repaired on our system. The written record must identify information about the cause of each leak that was found and repaired. Each leak shall be included on our annual report.

PERIODIC EVALUATION AND IMPROVEMENT:

Anytime there are changes to our system (new piping installations, replacements, etc.) or an emergency event as defined in our emergency plan, we shall conduct a re-evaluation of the risks to our system based on incidents or changes. We shall use a new threat assessment chart and recalculate our risk ranking as necessary.

In the event that there are no changes or events on our gas pipeline system, we, as the operator will re-evaluate this plan at least once every 5 years. If we determine that any additional actions may not be effectively reducing the risk on our system, personnel will be responsible to determine if any additional actions will be needed to meet the objectives of this plan.

RECORD KEEPING:

All written records shall be kept for at least 10 years to demonstrate our plan is being implemented and followed.