

Damage Related to Exemptions & Related Data

API/AOPL

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Excavation Damage and State One-Call Laws

- Leading cause of *injury* and *death* from pipelines
 - For oil pipelines, only about 6-7% of total accidents
 - 30% of serious consequences
- PHMSA Final Rule is forthcoming
- Current state activity to change excavation damage rules:
 - MI, MO, OK, PA

API – AOPL Damage Prevention and One-Call Exemption Survey

- API and AOPL conducted an informal survey of member companies to determine experiences with damages related to one-call exemptions from 2009 - 2012:
 - 9 Members Participated
 - 100+ Events
 - 32 Line Hits / 17 Involved Releases
 - 123 Near Misses
 - ◆ *Definition of “Near Miss” is Company Specific*

One-Call Exemption Survey Overview

Hits and Near Misses Causes:

- 39 Agriculture Exemptions
- 24 Gov't Departments
- 13 Property Owners
- 3 Railroad
- 3 Depth/Hand Tools
- 1 in Bay

Releases Resulting from Exemptions

City / County Exemption

- OK Subcontractor performing road work for County ; 2 bbl of crude oil
- NM County personnel grading for road maintenance struck pipeline 1362 MCF of HVL

Agriculture

- TX Farmer plowing field 15” over PL – 178 MCF of HVL
- OK Farmer performing normal farming activities – 30 bbls
- NE Farmer building Terraces 222 bbls
- TX Farmer Building ditch over driveway –20 bbls crude oil
- TX Farmer grubbing Mesquite - <1 bbl

Inland Waterways

- Bay Dredge Barge anchoring in Bay – 204 bbls

Survey Indicates Varied Excavator Interpretations of Exemption Definitions

- Agriculture Exemptions
 - *Need to define what type of work is “routine”*
 - Tilling vs. Tiling
 - Cultivation/Plowing/Planting
 - Ditching /Draining
 - Installing Posts
- Railroad Exemptions
 - *Need to clarify what work falls within “normal repair and maintenance”*
- Governmental Authority Exemptions
 - *Laws should apply evenly to state and private entities for similar activities*
 - Ditch Cleaning
 - Installing Signs

One Call Awareness and Impatience at Issue

- The survey results indicate that many types of excavation activities took place without placing a one call.
- Results also indicate that several excavators placed one calls, but failed to wait the required period prior to excavating.

Conclusion

- Although no formal national data, three years of operator experience demonstrates that pipelines are being damaged by exemptions.
- Absence of national data is no reason for inaction on safety threats.