

ATTACHMENT E
Public Awareness Program



Niska Gas Storage
Wild Goose Storage-LLC Facility
Public Awareness Program



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PUBLIC AWARENESS PROGRAM

1.0 PURPOSE and SCOPE

The purpose of the Wild Goose Storage - LLC (the 'Company, Wild Goose or WGS, LLC') Public Awareness Program is to outline the public educational requirements as defined within the American Petroleum Institute (API) Public Awareness Programs for Pipeline Operators Recommended Practice (RP) 1162. This program will provide customers, the public, appropriate government organizations, persons engaged in excavation, public/private utility companies, and related activities with information on how to identify the location of underground pipelines owned and operated by the Wild Goose and how to recognize and report a natural gas pipeline emergency. WGS, LLC will follow the general program recommendations of API RP 1162 and will assess the unique attributes and characteristics of our pipeline facilities.

2.0 MANAGEMENT SUPPORT

Impact to the environment, protection against harm to the public or its workers, prevention of damage to company materials and property are core business values of Niska Gas Storage Partners LLC (Niska), parent company of Wild Goose Storage LLC. Niska is dedicated to continuing our commitment of operating our facilities to the highest standard of health, safety and environmental compliance in the areas and communities in which we operate.

At Niska we take safety to the public and our employees seriously. Our WGS, LLC facility, located in northern California, was constructed and put into production in 1998 and has successfully stored natural gas without incident. During this timeframe, while delivering the clean and efficient natural gas our customers rely on daily for their comfort and livelihood, we have earned an enviable record for safety, reliability and environmental excellence.

The WGS, LLC facility has a total of 30 miles of transportation pipelines and is part of a 1.5-million-mile national underground pipeline network. Many people of the public sector are unaware of this vital transportation system that delivers the energy that drives our economy.

WGS, LLC operations is overseen and regulated by the United States Department of Transportation's (DOT) Office of Pipeline Safety (OPS) and its state partners. The DOT imposes minimum standards and the Company along with other pipeline companies, invest millions of dollars each year in training and new technology that is designed to monitor and continually improve the safety and integrity of their pipelines. These pipeline companies conduct public outreach programs to increase awareness about pipeline safety, as well as potential hazards and how to avoid them through proven damage-prevention practices. Government statistics indicate that pipelines are the safest transportation system in the nation today. WGS, LLC is committed to maintaining and strengthening this reputation for safety and pipeline integrity and fully supports this initiative. Wild Goose will strive to keep those inhabitants living within their pipeline right-of-way (R.O.W.), the general public and local excavators abreast of its operations and emergency response procedures.



2.1 Commitment

WGS, LLC will comply with all applicable health, safety and environmental laws and regulations. We will strive to maintain and continuously improve our operating practices, preventative maintenance procedures and emergency response activities at our facilities and will respond promptly and effectively to incidents or emergencies. Wild Goose will provide its employees and contractor personnel with the guidance and resources necessary to handle these types of situations. For evidence of Niska's commitment review [Exhibit 'A' Company Commitment & Support Statement](#).

2.2 Emergency Management Principles

Wild Goose's emergency management principles are to:

- Protect lives (personnel, emergency responders, public)
- Effectively rescue and treat casualties
- Minimize environmental impacts
- Minimize damage to company, public and private property
- Effectively use the combined resources of the Company, mutual aid partners, the government and/or their agencies and other external services
- Provide factual information to news media and other stakeholders on a timely basis, and
- Preserve records and evidence for use in post-incident investigations.

The Company recognizes the importance of emergency response and prevention, and has implemented controls and procedures to minimize the occurrence of an incident and manage this process as effectively as possible in the event that one does occur.

2.3 Pipeline Integrity Management Plan

WGS, LLC has developed a Pipeline Integrity Management Plan which contains the following procedures/ programs:

1. Surveillance of its facilities to identify:
 - Changes or anomalies with operations as a result of new developments (i.e. upgrade to cathodic protection systems)
 - Change in operating conditions or practices (i.e. pressure, temperature, flow)
 - Integrity of the system (i.e. failures, leakage, corrosion), and

- Incorporation of maintenance and monitoring practices.
- 2. A one-call system in place to ensure that underground facilities (i.e. pipelines, power lines, etc.) have been accurately located and identified.
- 3. A preventive damage program to minimize the risk of contact by mechanical means to an underground facility as a result of ground disturbance activities (i.e. excavations or drilling), and
- 4. A program that informs and educates the public of the hazards associated with pipeline and facility operation.

It is the Company's mandate to adhere to these guidelines while operating our facilities in a manner that reflects professionalism and concern for our neighbors that surround us.

3.0 RESPONSIBILITY FOR IMPLEMENTATION

Wild Goose Storage LLC is owned and operated by its parent company, Niska Gas Storage Partners LLC, located at 400, 607 8th Ave SW in Calgary, Alberta, Canada. It is the primary responsibility of the President of Niska to act as the Pipeline Manager of WGS, LLC for ensuring the implementation and performance of this Public Awareness Program to the parties identified within this document. The President will ensure that all roles and responsibilities, as identified in [Table 1-Roles and Responsibilities](#), are adhered to.

3.1 Roles and Responsibilities for Public Awareness Program

- 3.1.1 WGS, LLC will follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, unless the Company provides justification in its program or procedural manual as to why compliance with all or certain provisions of the recommended practice is not practicable and not necessary for safety.
- 3.1.2 The Manager of Engineering and Operations, also located at the Niska Gas Storage head office in Calgary Alberta Canada, is responsible for monitoring the effectiveness of educational programs and advising the President if changes are necessary, or could be made, to improve effectiveness.
- 3.1.3 The Company will select the most appropriate mix of target audiences, message types, delivery methods and frequencies for each pipeline or pipeline segment depending on the needs of the communities. The practices set forth establish the Company baseline for public awareness programs and describe considerations for program expansion that can further enhance specific public awareness outreach.

Description		Section #	President	Manager E&O	Plant Manager	Operator	EHS Co.
1.	Develop written damage prevention procedures	5.8					X
2.	Review and update damage prevention procedures as required.	5.8		X			X
3.	Define target audience	6.0	X	X			X
4.	Develop message content	7.1	X	X			X
5	Send mailing, brochures, etc. to target audience, or	8.1.1			X		
6	Conduct personal contact to target audience	8.2.1			X		X
7	Conduct mass comm. to target audience	8.2.3			X		X
8	Conduct electronic comm. to target audience	8.3			X		X
9	Send specialty advertising materials to target audience	8.4.5			X		
10	Expand program as appropriate for defined segments/systems	9.0	X	X	X		X
11	Perform program evaluation	10.0	X	X	X		X
12	Perform excavation activities according to procedures	9.3.4				X	
13	Maintain program records	12.0					X

Table 1 – Roles and Responsibilities

4.0 PRIMARY AUDIENCE FOR PUBLIC AWARENESS PROGRAM

The primary audience of the Public Awareness Program consists of:

- The affected public - i.e., landowners, residents, and places of congregation (businesses, schools, hospitals, etc.) along the pipeline and the associated right-of-way



- Local and state emergency response and planning agencies, i.e., Local Emergency Planning Committees (LEPC's)
- Local public officials and governing councils
- Private and public utility companies near the R.O.W., and
- Excavators

4.1 Educating the Public

1. The Company's program specifically includes provisions to educate the public, appropriate government organizations, and persons engaged in excavation related activities on:
 - a. Use of the one-call notification system to USA (Underground Service Alert) North prior to excavation and other damage prevention activities
 - b. Possible hazards associated with unintended releases from a gas pipeline facility
 - c. Physical indications that such a release may have occurred
 - d. Steps that should be taken for public safety in the event of a gas pipeline release, and
 - e. Procedures for reporting such an event.
2. This program and the type of media used to train the public must be as comprehensive as necessary to reach all areas in which the Wild Gosse transports gas via underground pipeline.
3. Training on the program will be conducted in English and in Spanish or in other languages commonly understood by a significant number and concentration of the non-English speaking population within the Company's area of operation.
4. Upon request, the Company will submit their completed programs to the Pipeline and Hazardous Materials Safety Administration (PHMSA).
5. The WGS, LLC Public Awareness Program and evaluation results must be available for periodic review by appropriate regulatory agencies.
6. The following elements of the Public Awareness Program are defined in more detail in the following sections;
 - Responsibility for Implementation (Section 1.0)
 - Public Awareness Program Objectives (Section 5.0)
 - Targeted audiences (Section 6.0)
 - Message Content for Key Stakeholder Audiences (Section 7.0)

- Delivery Method, Media, and Frequency (Section 8.0)
- Expandability of Public Awareness Program (Section 9.0)
- Program Evaluation and Effectiveness (Section 10.0)

5.0 PUBLIC AWARENESS PROGRAM OBJECTIVES

The objective of this program is to enhance public safety and environmental protection through increased public awareness and knowledge. There are five elements of the program to accomplish this goal. These elements are:

1. Emergency Response
2. Public Awareness of Pipelines
3. Prevention and Response
4. Management of the Public Awareness Program
5. Expandability and Continuous Improvement

5.1 Emergency Response

WGS, LLC is using industry standard technology and supervisory practices to ensure that there are no production upsets that could create a release of methane gas or other emergencies. Plant operators are highly skilled and trained to operate the plant.

In the event of an emergency, the WGS, LLC Emergency Response Plan (ERP) will be initiated and the entire Company's resources will be directed toward efforts that will ensure the safety of the workers, public and the environment.

5.1.1 Characteristics of Natural Gas

Natural gas (methane) is an odourless, colorless, non-poisonous, flammable gas, which is lighter than air and burns with a pale, faintly luminous flame. Methane has an explosive range of approximately 5% - 15% when mixed with air. Methane has a relative weight of .55 compared to air which has a relative weight of 1.0. It tends to rise and accumulate near the higher, stagnant parts of enclosed buildings and tightly closed storage pits. It is most likely to accumulate during hot, humid weather.

Marketed or sales natural gas is odorized with mercaptan which gives it a pungent noticeable odour, however gas inside Wild Goose Storage pipelines are **not** odorized and may not be detected by smell.



5.1.2 Signs of a problem

WGS, LLC facilities have a variety of automatic shutdown and alarm systems to protect worker and public safety. However, smaller problems may first be noticed by our operator's or by a neighbor.

Some signs of problems may include:

- Unusual smells
- Uncommon or unusual sounds
- Clouds of vapor
- Liquid spraying from a leak
- A pool of water
- An explosion or a fire

5.1.3 Potential Emergencies

Potential emergencies could result from an uncontrolled natural gas release caused by a storage vessel leak, break or failure of gas processing equipment.

It is important to note, that the probability of a significant incident or accident occurring during WGS, LLC operations, which could affect anyone's safety, is extremely remote. Uncontrolled releases from vessels and processing facilities typically do not occur suddenly or without warning. WGS, LLC field operations personnel must follow oilfield safety and operating practices which include daily checks and regular planned safety inspections of the processing equipment and pipeline systems.

5.1.4 What should a resident or land owner do if they suspect a problem?

If a resident believes there is a problem with any of the facilities they should not hesitate to contact WGS, LLC personnel at the 24-hour emergency number at **1-866-940-7351**

Members of the public must be encouraged to never attempt to investigate a potential problem. Emergency response is for professionals only and members of the public must stay away from the area. If a resident is unsure about how safe they are, a Wild Goose representative will advise them to remain sheltered inside their residence until a Company representative gives them the okay to leave. Review Section [5.1.6 Stay-In-Shelter Procedures](#).

5.1.5 What will WGS, LLC do if there is an emergency?

If a resident residing along the Wild Goose pipeline ROW calls the 24-hour emergency number at **1-866-940-7351**, a Company representative will travel to the area to investigate the concern.

In extreme situations, or if a problem is serious, a Company representative will talk with other neighbors and consider evacuating the public until the situation has been investigated and the problem addressed.

5.1.6 *Stay-In Shelter Procedures*

If an option, stay-in-shelter is an effective and viable means of public safety when:

- There is not enough time, or advanced warning, to initiate evacuation safely;
- Residents are waiting for evacuation assistance;
- The location of a release has not been identified;
- The release is of limited volume or short duration (several minutes to half-an-hour); and/or
- It is deemed that the public would be at a greater risk because evacuation may potentially expose individuals to hazardous or toxic substances due to a slow departure from the area or proximity of residence to incident site (i.e. residence is located immediately downwind).

If residents are advised to stay-in-shelter, Company personnel must advise them to not leave their residence, and to follow the instructions listed below. Remaining sheltered indoors will protect the public from possible explosion and/or reduce the possibility of igniting the vapor cloud via an internal combustion motor vehicle.

The Company representative will advise each stay-in-shelter resident to:

- Gather everyone inside their residence and, if possible, go to an inside room and stay away from outside windows and doors, and other places where gases may leak in.
- Please do not leave your residence.
- Shut off the main electrical breaker and extinguish all potential sources of ignition and strongly encourage them **“NOT TO SMOKE”** and **“NOT TO USE YOUR TELEPHONE”**. A Company representative will contact each resident with further instructions when the area is safe.

5.2 **Evacuation Procedures**

In the unlikely event where evacuation of a residence is required, a Company representative will contact the resident and recommend immediate evacuation from the area. Although the resident may not appear to be in any immediate danger, a shift in wind direction or an increase in the concentration of the gas could change the situation. The Company representative must ask if transportation or assistance to leave the area is required. WGS, LLC personnel will immediately dispatch to those residents requiring assistance.



If a resident is required to immediately evacuate their residence the Company representative will advise them to proceed immediately to a designated Evacuation Centre as specified by a WGS, LLC.

Company representatives must advise affected residents not to remain in the area any longer than necessary and not to attempt to pack personal items or belongings, or return to retrieve pets. If necessary, Wild Goose personnel will make arrangements to feed and water animals at the residence premises and arrange to have veterinarians available to monitor the health of animals.

Prompt arrival at the Evacuation Centre by each affected resident will assist Company representatives in identifying and accounting for evacuated persons, as well as those who could still be in the Emergency Planning Zone (EPZ) area. At the Evacuation Centre, informational updates will be provided and Company representatives will be available to address questions or concerns.

Residents choosing not to go to the Evacuation Centre must be asked to inform the Company representative where they will be going and how they can be contacted so that Wild Goose may confirm their safety and keep them informed of emergency evacuation updates.

Evacuation, unless under extreme circumstances, should only be required for a short period of time until the problem can be controlled and corrected. WGS, LLC will reimburse area users who have been requested to evacuate the area due to an emergency resulting from Company operations for any reasonable out-of-pocket expenses, such as; accommodations, meals, and transportation.

For further information emergency response or general inquiries telephone calls can be made to Wild Goose Gas Storage operations. Refer to [Table 2 – Wild Goose Storage Operations Phone Numbers](#).



Who to Call	Phone Number
Wild Goose Control Room – between 7:30 a.m. – 5:00 p.m.	1-530-846-7351
On-Call Operator	1-800-352-8771
24-Hour Emergency Contact Number	1-866-940-7351

Table 2 – Wild Goose Storage Operations Phone Numbers

5.3 Public Awareness of Pipelines

The WGS, LLC Public Awareness Program will assist in raising the awareness of the affected public and key stakeholders of the presence of pipelines in their community, and help them understand their role in transporting energy. WGS, LLC believes a more informed public along pipeline routes will supplement the Company’s pipeline safety measures and will contribute to reducing the likelihood of emergencies and /or releases.

One way of informing the public of the location of underground pipelines and other facilities is by usage of pipeline markers along the pipeline right-of-way.

5.4 Pipeline Marker Signs

In order that the public and residents living within a WGS, LLC pipeline ROW are aware of pipelines in their vicinity, the Company will install pipeline warning signs that include the words “Warning”, “Caution” or “Danger” followed by the words “Gas Pipeline” along with the Company name ‘Wild Goose Storage-LLC’ and telephone numbers identified in Table 2 – Wild Goose Storage Operations Phone Numbers where a Company pipeline operator can be reached at all times.

5.4.1 Aboveground Pipeline Marker Signs

The primary purposes of aboveground pipeline marker signs are to:

- Mark the approximate location of a pipeline,
- Provide public awareness that a buried pipeline or facility exists nearby,
- Provide a warning message to excavators about the presence of a pipeline or pipelines,
- Provide pipeline company contact information in the event of a pipeline emergency, and
- Facilitate aerial or ground surveillance of the pipeline right-of-way by providing aboveground reference points.

Aboveground pipeline markers will be installed:

- At each side of the crossing where a pipeline crosses a highway, road, railway or watercourse;
- Within the land acquired for the pipeline and facing the highway, road, railway or watercourse,
- If the pipeline right of way adjoins the right of way of a highway, road or railway, on the common boundary of the rights of way but not within the right of way of the highway, road or railway, and
- If the pipeline is:
 - Located in a ditch or unpaved area in the right of way of a highway or road; or
 - Conveying HVP product in an urban area, at intervals that will clearly and continuously mark the location of the pipeline.

5.5 **Underground Service Alert (USA) North - One-Call Center**

The Underground Service Alert, known as "USA", provides a high quality Underground Facility Damage Prevention service to Central / Northern California and Nevada. USA's purpose is to receive planned excavation reports from public and private excavators and to transmit those planned excavation reports to all participating members of USA who may have underground facilities at the location of excavation. Wild Goose is an active member of USA North. USA members will either, mark or stake their facility, provide information or give clearance to dig. USA North can be contacted at <http://www.usanorth.org/> or by calling 8-1-1 or 1-800-227-2600.

California Law Requirements To Join USA

Every operator, including Wild Goose Storage, of a subsurface installation, except the Department of Transportation, shall become a member of, participate in, and share in the costs of, a regional notification center, (USA).

5.6 **Company Websites**

WGS, LLC may at some point of operation decide to enhance communications to the public through the use of a Company website on the Internet. Since a corporate website will consist of various business needs (e.g. investor relations, marketing, affiliate needs etc.) the guidance in this section strives to communicate the minimum features of the Company damage prevention program. A Company website will supplement, not replace, the other various direct outreach delivery tools discussed in this program. The WGS, LLC website is <http://www.niskapartners.com/>.

5.7 **National Pipeline Mapping System**

The National Pipeline Mapping System (NPMS) is a geographic information system (GIS) created by the U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS) in cooperation with other federal and

state governmental agencies and the pipeline industry. The NPMS consists of geospatial data, attribute data, public contact information, and metadata pertaining to the interstate and intrastate gas and hazardous liquid transmission pipelines, liquefied natural gas (LNG) plants, and hazardous liquid breakout tanks jurisdictional to PHMSA.

The nominal accuracy of geospatial data in the NPMS is +/-500 feet. Therefore, the NPMS cannot be used as a substitute for contacting a one-call center before excavating. Attributes in the NPMS pipeline data layer include:

- * PHMSA-assigned operator identification number
- * Operator name
- * System name
- * Subsystem name
- * Diameter (voluntary data element)
- * General commodities transported
- * Interstate/intrastate designation
- * Operating status (in service, abandoned, retired)
- * Geospatial accuracy estimate

The NPMS does not contain information on interconnects, pump and compressor stations, valves, direction of flow, capacity, throughput, or operating pressure. In addition, distribution and gathering pipelines are not included in the NPMS.

The NPMS is built from data submitted by pipeline, LNG plant, and breakout tank facility operators. Since 2002, transmission pipeline and LNG plant facility operators are required to submit mapping information to the NPMS and to update their submissions annually. Breakout tank operators are able to submit data to the NPMS on a voluntary basis.

Members of the public can access the National Pipeline Mapping System website to find out which pipelines are located in their area @ <http://www.npms.phmsa.dot.gov/>

5.8 Prevention and Response

This program will also help train the public to understand the steps that must be taken to prevent and initiate response to pipeline emergencies.

'Prevention' refers to the object of reducing the occurrences of pipeline emergencies caused by third party damage through awareness of safe excavation practices and the use of the USA North one-call system.

'Response' steps include: protecting life, property, the environment and to promptly notify pipeline companies and emergency response officials in the event of a release or emergency.

5.9 Management of Public Awareness Programs

Another important objective of this program is to provide the Company with a framework for managing public awareness programs so that the quality of this program can be continually reviewed and improved as appropriate.

Expandability and Continuous Improvement of Public Awareness Programs

In the following sections, references are made to expanding or “scaling” the frequency, message, delivery method or geographic coverage area of public awareness program activities when special conditions along the pipeline ROW suggest a more intensive effort. While there may be other reasons to intensify public awareness activities, the presence of federally designated high consequence areas (HCA’s) is an example that may prompt the Company to supplement public awareness activities.

6.0 TARGETED AUDIENCES, I.E. “STAKEHOLDER AUDIENCES”

This section defines the intended audiences for the Public Awareness Program and provides examples (not all inclusive) of each audience. The five intended “Stakeholder Audiences” include:

- The affected public - i.e., landowners, residents, and places of congregation (businesses, schools, etc.) along the pipeline and the associated right-of-way
- Local and state emergency response and planning agencies, i.e., Local Emergency Planning Committees (LEPC’s)
- Local public officials and governing councils
- Private and public utilities
- Excavators

7.0 MESSAGE CONTENT FOR KEY STAKEHOLDER AUDIENCES

7.1 Message Content

The Company will select the optimum combination of message, delivery method, and frequency that meets the needs of the intended audience. Information materials may also include supplemental information about WGS, LLC, including pipeline operations, company safety record and any other information that is deemed appropriate for the audience. Communications materials will be provided in both English and Spanish or in the language(s) spoken by a significant portion of the intended audience.

The basic message conveyed to the intended audience will provide information that will allow the operator to meet the program goals. The communications will include enough information so that in the event of a pipeline emergency, the intended audience will know how to identify a



potential hazard, protect themselves, notify emergency response personnel, and notify Wild Goose Storage personnel.

7.2 Pipeline Maintenance Activities

When planning pipeline maintenance-related construction activities, WGS, LLC will communicate to each stakeholder affected by the activity in a manner that is appropriate to the nature and extent of the activity. For major maintenance construction projects (such as main-line rehabilitation or replacement projects) the Company will also notify appropriate emergency and local public officials and include information on further communications appropriate to the nature or local impact of the maintenance or construction activity. Acquisition of permits may satisfy the appropriate communications needs.

8.0 DELIVERY METHOD, MEDIA, AND FREQUENCY

This section describes the potential delivery methods and tools available that WGS, LLC will use to foster effective communication programs with stakeholder audiences previously described. This section does not imply that all methods are effective in all situations or that all methods will be implemented. The content of the communication efforts will be tailored to the needs of the audience and the intent of the communication.

8.1 Print Materials

8.1.1 Targeted Mailings, Brochures, Flyers, Pamphlets, Leaflets

Targeted mailings, brochures, flyers, pamphlets and leaflets are the most common message delivery mechanisms that the Company can use to distribute information regarding the WGS, LLC Public Awareness Program. Printed materials will convey important information about Wild Goose Storage-LLC, the gas storage industry, pipeline safety, or a proposed project or maintenance activity and will provide contact information where the recipient can obtain further information. Print materials also afford an effective opportunity to communicate content in a graphical or pictorial way.

Print materials, in the form of targeted mass mailers can be mailed to landowners or communities along the pipeline system ROW or handed out at local community fairs, open houses, or other public forums. The Company may hire facilitators to organize mass mailings, using nine-digit zip codes or geo-spatial address databases, to designated residents in the community located along the pipeline, such as within an appropriate distance either side of the pipeline centerline.

Mailers or brochures alone will be considered effective communication with the affected public. Another example of a delivery method is reviewing the Niska Gas Storage Emergency Response Plan (ERP) with local emergency response personnel.

8.1.2 Letters

Research has indicated that letters mailed to landowners along a pipeline system ROW are one of the most effective tools to communicate specific information that the operator wants to convey such as what to do in the event of a leak, identification of suspicious activity or notification of planned activities within the right-of-way.

Notification letters are especially effective with property owners that may have a high likelihood for third party damage such as in agricultural areas, new developments and where other types of ground disturbing activities may take place. Similar letters to contractors, excavators and equipment rental companies informing them of the requirement to use USA North and providing other important safety information for their workers and the public are also effective.

Letters can be a more personalized delivery system for the brochures described above and shall always provide a mechanism where the recipient can obtain further information (such as website address, e-mail address, local phone numbers and one-call numbers).

8.2 Personal Contact – General

Face-to-face personal contact describes contacts between WGS, LLC and the intended stakeholder audience that is performed in person. The method is usually a highly effective form of communications, and it allows for two-way discussion. This may be done on an individual basis or in a group setting. Niska will use the face-to-face contact method for educating emergency response officials by:

- Personal delivery of pipeline safety literature
- Conducting an Open-House and inviting stakeholders
- Conducting presentations at their facilities, or
- Conducting group meeting

Some other examples of face to face communications are described below:

8.2.1 Door-to-Door Contact along Pipeline Right-of-Way

This method is often used to make contact with landowners/residents along the pipeline right-of-way to relay pipeline awareness information or information on upcoming maintenance. This method can also build trust, which is an integral part of communication and enhancement to the long-term public awareness program. Company representatives making this contact must be knowledgeable, courteous and provide the landowner/resident with basic pipeline safety information and a means for future contact.

If pipeline safety is to be discussed in this forum, the Company representative shall be generally knowledgeable about the Niska Gas Storage Pipeline Integrity Management Program and



emergency response procedures. In addition to the general information, the following additional information shall also be considered:

- a. Description of facilities on or near the property (i.e., pipelines, meter/ regulator stations, compressor/pump stations, wellheads, treating facilities, storage tanks, line markers, cathodic protection, communication, etc.).
- b. Description of easement and property owner's rights and limitations within easement (may provide literature on encroachment standards).
- c. Name and phone number of local contacts within the Company so that further information can be obtained
- d. The WGS, LLC 24-hour emergency contact number so that emergencies or suspicious activity can be reported.
- e. Information on damage prevention and local "Call, Before You Dig" programs.
- f. What to do in case of emergency (fire, leak, noise, suspicious person).
- g. Trinkets (i.e. calendar, magnetic card, pens, hats, etc) to retain important telephone numbers.
- h. As appropriate, additional local information such as upcoming maintenance, projects, events and/or Company community involvement such as United Way, other charities, environmental projects, etc.

8.2.2 Telephone Calls

When the intended audience is small in number, it may be more effective to communicate by telephone. This personal form of contact allows for two-way discussion. WGS, LLC shall decide which elements of their public awareness program are suitable for conducting via telephone calls.

8.2.3 Group Meetings

Group meetings can be an effective way to convey the messages to selected audiences. Meetings may be between the Company and an individual audience or with a number of the different audience groups at one time. For example, group meetings could include individual meetings with emergency response personnel, combined industry meetings with emergency response personnel and inviting emergency response officials and personnel to the Company's emergency response tabletop drills and deployment exercise. Meeting in advance with local emergency response personnel can reap tremendous benefits in responding to and coordinating during an actual emergency. Additional meetings include those with state one-call system events, local excavators, contractors, land developers and other utilities.

8.2.4 Open House

An open house provides an informal setting to introduce an upcoming project, provide a "get to know your neighbor" atmosphere or to discuss an upcoming maintenance activity such as pipeline segment replacement. Tours of the WGS facility, question and answer sessions, videos, or presentations about pipeline safety and reliability do well in an open house environment. Even without formal presentations, allowing the public to see the facility can also be very effective. Often this type of forum will include refreshments and handouts (see brochures, letters, etc. elsewhere in this section) that attendees can take with them.

8.2.5 Community Events

Community sponsored events, fairs, charity events, or civic events may provide appropriate opportunities where public awareness messages can be relayed. The Company can participate with a booth, as a partial sponsor of the event. These forums are generally used to remind the community of the Company's presence, show support for community concerns, and heighten public awareness about the benefits of pipeline transportation and about pipeline safety. Examples of community events include:

- a. County and state fairs
- b. Festivals and shows
- c. Job fairs
- d. Local association events
- e. Trade shows (Energy Fair)
- f. Chamber of Commerce events

8.2.6 Charitable Contributions

While contributions to charities and civic causes are not in themselves a public awareness effort, the Company will consider appropriate opportunities where public awareness messages can be conveyed as part of or in publicity of the contribution. Examples include:

- a. Contribution of gas detection equipment to the local volunteer fire department,
- b. Donation of funds to acquire or improve nature preserves or green space,
- c. Sponsorship to the community arts and theatre, or
- d. Support of scholarships (especially when given to degree programs relevant to the Company or industry).

8.3 Electronic Communications Methods

8.3.1 Videos and CD's

There are a variety of approaches the Company can use to supplement the delivery of the Public Awareness Program such as the utilization of videos. While a supplement to the minimum components of an effective public awareness program, videos may be quite useful with some stakeholders or audiences in some situations. Videos can show activities such as construction, natural gas or petroleum consumers, pipeline routes, preventive maintenance activities, simulated or actual spills and emergency response exercises or actual response that printed materials often cannot. WGS, LLC may seek industry specific videos from trade organizations or develop their own customized version. Such videos can be used for landowner contacts, emergency official meetings, or the variety of community or group meetings described elsewhere in this section.

8.3.2 Electronic Mail (E-mail)

E-mail can be a supplemental way to send public awareness information to a variety of stakeholders. The content and approach is similar to letters or brochures, but the information is sent electronically rather than delivered by mail, person or during meetings.

E-mail contact information can be provided on Company handouts, magazine advertisements, websites and other written communications. This provides an effective mechanism for the public to request specific information or to be placed on distribution lists for specific updates.

An advantage of e-mail is the ease of requesting and receiving return information from the recipient.

8.4 Mass Media Communications

8.4.1 Public Service Announcements (PSA's)

Radio and television stations occasionally make some airtime available for public service announcements. There is great competition from various public interest causes for the small amount of time available because the broadcast media is no longer required to donate free airtime for PSA's. Given the popularity of radio and television and the large areas covered by both, public service announcements can be an effective means for reaching a large sector of the public. Contacting local stations along the pipeline route to encourage their use of the PSA's could be considered. The use of cable TV public access channels may also be an option.

8.4.2 Newspapers and Magazines

Newspaper/Magazine articles don't have to be limited to reactive coverage following an emergency or controversy. Encouraging a reporter to write constructive stories about pipeline issues in various topics of relevance, such as local projects, excavation safety or the presence of pipelines as part of the energy infrastructure can be initiated. Even if the reporter is covering an

emergency or controversial issue, pipeline companies can leverage the opportunity to reinforce key safety information messages such as damage prevention and the need to be aware of pipelines in the community. Trade magazines such as those for excavators or farmers often welcome guest articles or submission or assistance in writing a positive, safety-minded story for their readers.

8.4.3 *Paid Advertising*

The use of paid advertising media such as television ads, radio spots, newspapers ads, and billboards can be an effective means of communication with an entire community. This type of advertising can be very expensive, but can be made more cost effective by joining with other pipelines, including the local utilities, to deliver a consistent message.

8.4.4 *Community and Neighborhood Newsletters*

Information contained within newsletters shall be similar to that made available for newspapers and magazines. Posting of pipeline safety or other information to community and neighborhood newsletters can be done in conjunction with outreach to those communities and/or neighborhoods and is usually done for free. This method can be particularly effective in reaching audiences near the pipeline, namely neighborhoods and subdivisions through which the pipeline traverses.

8.4.5 *Specialty Advertising Materials*

Specialty advertising can be a unique and effective method to introduce the Company or maintain an existing presence in a community. These tools also provide ways of delivering pipeline safety messages, project information, important phone numbers and other contact information. Many such materials or items exist, including Company logo: refrigerator magnets, calendars, day planners, thermometers, key chains, flashlights, hats, jackets, shirts, clocks, wallet cards, and other such items containing contact information and/or a short message (i.e. "Call, Before You Dig"). The main benefit of this type of advertising is that it tends to have a longer retention life than printed materials because it is otherwise useful to the recipient. Because of the limited amount of information that can be printed on these items, they shall be used as a companion to additional printed materials or other delivery methods.

8.4.6 *Informational or Educational Items*

Develop informational and educational materials for groups or schools that heighten pipeline awareness. Companies (and their industry associations) may also sponsor or develop training materials for emergency response agencies that are designed to increase knowledge and skills in responding to pipeline emergencies. Alternatively, local emergency officials will hold training as part of their own continuing education and attendance by pipeline personnel at these sessions is often welcome and an ideal setting for relaying public awareness information about pipelines.

9.0 EXPANDABILITY OF PUBLIC AWARENESS PROGRAM

9.1 Expandability of the Public Awareness Program

Modification or revision of the Niska Gas Storage Public Awareness Program takes into account the differences in pipeline conditions, consequences, population, increased development/excavation activities and other issues along pipeline systems. This program allows WGS, LLC to develop a program that is “scaled” based on appropriate stakeholder and pipeline segment needs.

Accordingly, a “one-size-fits-all” public awareness program across all pipeline systems/segments would not be the most effective approach since some geographic areas have a low population, low turnover in residents, and little development or excavation activity; while other areas have very high population, high turn over, and extensive development and excavation activity.

The Public Awareness Program provides WGS, LLC with a minimum recommended, or baseline, public awareness program and provides the Company with considerations to determine how to expand the program to provide a greater level of public awareness outreach in certain areas. Details of program expansion are presented below.

9.2 Consideration for Program Expansion

When external factors along the pipeline route indicate that program expansion is warranted, the following sections are provided for guidance. Three primary forms of program “expandability” are provided for consideration in the development and administration of each public awareness program:

1. Increased Frequency (Shorter Interval) – Refers primarily to providing certain communications to certain stakeholder audiences on a more frequent basis (shorter interval) than the baseline recommended minimum using the same content and delivery methods/media.
2. Supplemental Efforts – Refers to providing additional or supplemental communications activities above and beyond those identified in the baseline recommended minimum using the same or possibly a more custom tailored message content and different, or additional, delivery methods/media to reach the intended audience.
3. Coverage Areas – Refers to broadening or widening the stakeholder audience coverage area beyond those prescribed in the baseline recommended minimum for delivery of certain communications messages.

9.3 Consideration of External Factors

WGS, LLC will conduct periodic program evaluations at a minimum, every four (4) years and will review external factors along pipeline routes and right’s-of-way and consider what components of the public awareness program require expansion.



At a minimum, WGS, LLC will consider each of the following general external factors, applied along the entire route of the pipeline system, in assessing the potential expansion of their public awareness program:

- Pipeline release consequences
- HCA as defined by 49 CFR 192.903 – Transportation of Natural and Other Gas by Pipeline
- Population density
- Land development activity
- Land farming activity
- Third Party damage incidents
- Environmental considerations
- Pipeline history in an area
- Specific local situations
- Regulatory requirements
- Results from previous public awareness program evaluations
- Other relevant needs

Another factor to consider is the hazard associated with the pipeline as perceived by either the Company or the stakeholder audience. For example, if a pipeline segment has experienced damage as a result of third parties; prudent action would dictate that the frequency of messages to those third parties and other related stakeholder audiences would be increased. If the public's confidence in pipeline safety is undermined by a high profile emergency, even though a specific company is **not** experiencing an upward trend, WGS, LLC shall consider expanding the public awareness communications to their stakeholder audiences to restore confidence in their adjacent pipeline system. Further detail of considerations for program expansion is discussed in the following sections.

Examples for program expansion may include:

9.3.1 The Affected Public

- (a) Consideration shall be given to increased frequency and supplemental efforts to the Affected Public when known instances indicate an elevated potential for third party damage. For example:

- An additional mass mailing to farmers just prior to the deep plowing season where deep till plow methods are used,
 - An additional or interim mass mailing to Landowners/ Residents of new housing developments in areas along the pipeline route that may not have previously been reached.
- (b) Heavily developed urban areas are more likely to have a higher turnover rate than more stable, less dense suburban or rural areas. Turnover rates in an identified audience area shall be considered when determining increased frequency and supplemental efforts to:
- Landowners/Residents in high turnover areas such as multi-family developments or densely populated urban areas.
- (c) In areas where right-of-way encroachments have occurred frequently, consideration shall be given to increased frequency and supplemental efforts to:
- Residents/Developers/Contractors in areas of right-of-way encroachment.
- (d) In areas where the potential for concern about consequences of a pipeline emergency is identified, extend beyond the specified minimum public awareness communications area (band width). Consideration shall be given to expanding the coverage area for:
- HVL pipelines in high population areas, extend the coverage area beyond the 1/8th mile minimum distance,
 - Other pipelines where pipelines emergencies may affect the public outside of the specific minimum coverage area.

9.3.2 Public Officials

Consideration shall be given to increased frequency and supplemental efforts where:

- Heightened public sensitivity to pipeline emergencies in the area, independent of cause or which the Company was involved,
- Significant right-of-way encroachments (such as new construction developments) are occurring.

9.3.3 Emergency Officials

Consideration shall be given to increased frequency and supplemental efforts where:

- Emergency officials have heightened sensitivity to pipeline emergencies,

- After post-emergency review, or where there's potential for enhanced "liaison activities" between the Company and emergency officials that could have improved the emergency response to a pipeline emergency, or
- Requested by emergency officials to provide additional communications.

9.3.4 Excavators/Contractors and One-Call Centers

Consideration shall be given to increased frequency and supplemental efforts where:

- There are instances which indicate an elevated potential for third party damage,
- Developers and contractors are performing a high number of excavations along a pipeline route in developing areas,
- There are instances of problems identified with excavators' use or lack of use of the One-call system.

10.0 PROGRAM EVALUATION AND EFFECTIVENESS

This section provides guidance on how to periodically, on an annual basis, evaluate the WGS, LLC Public Awareness Program to determine whether the goals of the program are being met and assess the effectiveness of the communication messages, delivery mediums and frequency of activities. The overall goal of the program evaluation shall be to assure sufficient awareness by the affected public of the pipeline, emergency notification and appropriate response actions so that adjustments are made in the program in an aim of continuous improvement.

An evaluation of this program shall be conducted at a minimum frequency of four (4) years. This evaluation program is presented to assure consistent baseline evaluations on all segments or pipelines.

While not a specific goal of the Public Awareness Program, another important outcome of an effective public awareness program (along with safe performance) is the establishment or reinforcement of the Company's reputation as a safe operator. A solid reputation as a safe operator is an intangible asset the can facilitate awareness and acceptance of the Company operations, facility expansion plans and provide a more constructive base of community relations if an emergency occurs.

10.1 Evaluation Objectives

The evaluation of the Public Awareness Program shall address the following short and long term questions and objectives:

- a. Is the Company doing what it says it will do in the written program?
- b. Is the process for conducting the public awareness program supported by management with specific and understandable action plans and personnel accountability?

- c. Are the public awareness activities conducted as cost-effectively as possible while still achieving goals?
- d. Are the materials used in the program readable and understandable, and do they convey the key messages to the intended stakeholder audience?
- e. Does the Company feel confident that, if asked, a sufficient number of the target stakeholder audience will recall the most important messages and information relayed to them and that this knowledge contributes to improving pipeline safety?

10.2 Evaluation Techniques

A number of potential evaluation techniques are described below. Each can provide value to the evaluation and improvement of a public communication program, although not all provide statistically valid results.

10.2.1 Self-Assessment Techniques

Self-assessments can be completed using a cross-functional internal working group to review the written program, collect data, randomly check documentation, and verify actions. The Company could also engage a third-party to conduct an assessment and provide recommendations.

10.2.2 Feedback or Reply Messages

Feedback postcards (often called reply or bounce-back cards) or e-mail reply forms can be included in public awareness materials, events or meetings. Usually these are designed to solicit quick reactions, short comments or suggestions or check-box rankings. This technique can be very relevant to the public awareness program but general reaction comments, perceptions and self-selected “sample” group are also valuable. While not always representative of a statistically valid sample group, such feedback can be extremely effective input to the Company’s public awareness program activities.

10.2.3 Focus Groups or Interview Panels

A group of people representative of one or more target audiences can be gathered to provide feedback about one or more aspects of the public awareness program. Such feedback can be obtained using a very formal, professionally administered “focus group” but can be just as valuable with objective, open and documented feedback sought on a more informal basis. This technique is effective in pre-testing public awareness materials and seeking feedback about the outcomes or knowledge impact. The results of focus groups or interview panels conducted by others, such as industry associations, can also be reviewed by the Company and findings incorporated into its own public awareness program.

10.2.4 Feedback Instruments

Although not statistically valid, public responses to requests for feedback via response cards, e-mail comments, unsolicited letters or phone calls, comments during meetings, planned dialogue sessions (e.g. post-emergency) can be documented and used in the program evaluation and enhancement process. Another important means of obtaining feedback is through government conducted public meetings, where views on public awareness and industry communications are discussed.

10.2.5 Audience Counts

Any number of statistics can be developed, maintained and referenced as indications for program effectiveness. These could include, for example, counts of the number of mass mailings, public official visitations, emergency response exercise attendees, number of reply cards received, and number of e-mail inquiries through the Company's internet site. These could also include categorization and count of internet site viewers (on the relevant pages), attendance at meetings, numbers of face-to-face landowner contacts, etc.

10.2.6 Surveys of Affected Audience

A properly conducted survey assures a randomly selected, statistically valid sample group of one or more target audiences (e.g. landowners along pipeline route or right-of-way, emergency response officials, excavators in region, etc.). The design of the survey could be comprehensive and measure all aspects of the program (message content, delivery medium, frequency and retention of knowledge of those surveyed). Alternatively a survey could be more focused and solicit data on only one or more aspects of a program. Generally, surveys need to be professionally designed and conducted to assure statistical significance and validity. The Company may:

1. Develop and conduct a survey on its own system using internal or external expertise;
2. Select a survey format designed by external parties or an industry association, or alternatively, or
3. Assess the results and incorporate findings of surveys conducted on behalf of many pipeline companies or through industry associations. If results of an industry association survey are used, WGS, LLC will seek to have the results segmented by region to heighten the relevance of results to the Company's own system(s).

10.2.7 Self Assessment

A self-assessment answers the following questions:

- *Is the Company doing what it says it will do in the written program?*

- *Is the process for conducting the public awareness program supported by management with specific and understandable action plans and personnel accountability?*
- *Are the Public Awareness activities conducted as cost-effectively as possible while still achieving goals?*

The self-assessment shall include:

- a. Confirmation that the written program has been established and is updated as major organizational changes are made,
- b. Confirmation that personnel assigned responsibilities identified in this program are aware of their responsibilities and have management support (e.g. budget and resources) for carrying out their responsibilities,
- c. An assessment to assure regulatory requirements have been met on a timely basis,
- d. Verification that all actions identified in this program have been in fact carried out,
- e. A review of documentation so that all actions can be confirmed,
- f. Confirmation that WGS, LLC has appropriately identified significant concentration(s) of non-English speaking residents along the right-of-way and the public awareness program activities have addressed the language difference (as required by 49 CFR - Parts 192), and
- g. An assessment of the materials and means used to determine if more efficient or more effective approaches are justified (e.g. use of in-house mailing using existing landowner (transmission) or customer (local distribution) lists versus use of service companies who identify mailing lists and complete the process; or a review of excavation one-calls, close calls or damage to determine if a more intensive approach in one segment is justified)

10.2.8 Pre-Test Effectiveness of Materials

The effectiveness and clarity of written or electronic communication materials can be assessed in advance of delivery to determine if improvements can be made. An evaluation during the formative or developmental stages of preparing materials can answer the question:

“Are the materials used in the WGS, LLC Public Awareness Program understandable, readable, and convey the key messages to the intended audience?”

For example, the Company can send draft materials to a small or sample group of affected public, public officials, or employees in other departments and get valuable feedback about whether the messages intended are likely to be received by the targeted audience. Pre-testing effectiveness and clarity of materials in advance of mass production and distribution is extremely helpful in assessing strengths and weaknesses of materials during the final stages of

development. Input received during pre-testing of materials can be used to correct language or graphics that will reinforce the main messages of the Company's public awareness program goals.

10.2.9 Measuring Public Awareness Activities

A valuable tool in monitoring a public awareness program is to establish several key measures that gauge whether the program is reaching intended audience. Potential measures include (but are not limited to) a system-wide compilation of the following data tracked over time.

- Number of recipients of mailings in a given year, including comparison of total mailings to number of pipeline miles,
- Number of response, "bounce-back" or reply cards received following a mass mailing,
- Total number of personal meetings with emergency responders and/or number and total attendees in emergency response drills or exercises conducted with emergency response officials,
- Number of excavation one-call notifications received by pipeline section or region,
- Number of attendees at public open houses or tours

The Company will need to track at least some measures such as those listed above to provide a gauge of the total number of affected audiences that have successfully received key public awareness information.

10.2.10 Measuring the Outcomes or Impacts of the Public Awareness Program

Evaluating the outcomes of the Public Awareness Program will help answer the questions:

"Does the Company feel confident that, if asked, a sufficient number of the target audience will recall the most important messages and information relayed to them, and does this knowledge contribute to improving pipeline safety?"

There are several ways WGS, LLC can collect information to make judgments about how effective the Public Awareness Program is in raising awareness of the nearby pipeline systems, improving knowledge of how to recognize and respond to leaks or impacting behaviors that decrease the risk of third-party damage. The evaluation portion of the WGS, LLC Public Awareness Program shall include at least one measure of long-term outcome or impacts. The following illustrate some approaches that will be used to validate that the public awareness program is achieving the outcomes and impacts desired:

10.2.11 Assess Knowledge during Personal Encounters with the Affected Public

While not a statistically valid measure, encounters with the affected public can provide valuable input. For instance, feedback could be sought on 3-4 questions whenever a landowner/business

is personally dealt with for maintenance access. Another opportunity is to seek feedback on 1-2 questions added to the emergency reporting log or from emergency officials following a joint-exercise. The Company's instructions for conducting and documenting this type of interaction could be modified to solicit feedback on specified questions for purposes of measuring public awareness impact, and the documentation routed to the personnel responsible for public awareness assessment.

10.2.12 Survey Measuring Impact of Public Awareness Program

A statistically valid, well-designed survey targeting one or more affected public categories is one of the most comprehensive ways to measure outcomes and impacts. Surveys can be conducted on a large population along pipeline routes to evaluate the full scope of the program activities or a smaller survey can be done to evaluate a specific aspect or initiative.

10.3 Minimum Components of Public Awareness Evaluation

The Company's evaluation process shall be developed to coincide with the overall cycle of communication initiatives undertaken. Specifically, the results of evaluations need to be incorporated through adjustments and enhancements (as necessary) to the public awareness program. Because communication activities are planned, budgeted and conducted on a 2-3 year cycle, the evaluation program shall be timed to ensure feedback in sufficient time to incorporate findings into the next "cycle" of public awareness program activities.

11.0 MEASURING IMPACT ON REDUCING THIRD PARTY DAMAGE AND SUPPLEMENTAL ACTIVITIES

11.1 Measuring Impact on Reducing Third Party Damage

The one aspect of pipeline safety *most influenced* by an effective public awareness program is a reduction in third party excavation damage. Niska will track such occurrences using the Niska Gas Storage Incident Reporting and Investigation Guideline to identify improvements or trends, both over time and as compared to industry-wide performance.

11.2 Supplemental Activities

The Niska Chief Operating Officer manages pipeline assets and will have the responsibility to determine if any supplemental activities or revisions of the program's elements are necessary to communicate a message to any respective member of the Stakeholder Audience Group.

Initial and subsequent program evaluations will consider the following factors applied to the entire pipeline system or around the facility areas:

- Potential Hazards
- High Consequence Areas

- Population Density
- Land Development Activity
- Land Farming Activity
- Third Party Damage Incidents
- Environmental Considerations
- Pipeline History in Area
- Specific Local Situations
- Regulatory Requirements
- Other Relevant Needs

Supplemental activities that may be implemented may include the following:

- Increased communication frequency to specific stakeholders.
- Enhancing the message content and the delivery method.
- Broadening the stakeholder audience.
- Expanding the buffer distance for Stakeholder Audience coverage along the right-of-way.
- Face-to-face communications with builders/developers along right-of-way.

If portions of the pipeline are designated High Consequence Areas (HCA's), a review of the type of HCA, local understanding of the HCA and pipeline may warrant possible supplemental enhancements to the Public Awareness Program. Niska will include supplemental activities as identified above. All HCA's (if any) and supplemental enhancements will be reviewed when the entire program is reviewed on an annual basis.

The following are examples for consideration of supplemental program enhancement:

- Occurrences indicate an increase potential for third party damage.
- Increased right-of-way encroachments.
- The area becomes developed and becomes heavily populated with resident turnover.
- Increased public awareness and inquiry to possible pipeline emergencies.
- Increased information requests from public officials and/or emergency officials.



- Increased number of land development and/or excavation activities in area.
- Increased level of locate requests through the One-Call Centers.

If a supplemental activity is conducted, Niska's Pipeline Manager will be responsible for implementing and maintaining the additional documentation materials.

12.0 RECORDS

The following records will be maintained at the WGS, LLC facility office:

- 12.1 A list identifying each of the residents residing along the Company ROW. This list will include: names, telephone numbers, special needs of inhabitants and mailing addresses. This list will be updated as appropriate.
- 12.2 Documentation of the transmittal of information or the participation in activities publicizing the Company's Public Awareness Program. Documentation will be retained for at least five (5) years.

13.0 REFERENCE

- * 49 CFR, Sections 192.614(c)(2), 192.616, and
- * API RP #1162, Public Awareness Programs for Pipeline Operators
- * Office of Pipeline Safety (OPS) Interpretation Letter, February 4, 1993
- * Office of Pipeline Safety (OPS) Damage Prevention Self Assessment Form, www.ops.dot.gov (RP 1162 Resources)
- * December 17, 2002 Pipeline Safety Act
- * Office of Pipeline Safety (OPS) Advisory Bulletin ADB-03-04, August 2003



Exhibit "A" Company Commitment & Support Statement

COMPANY COMMITMENT & SUPPORT STATEMENT

Niska Gas Storage Partners LLC, parent company of Wild Goose Storage LLC, is committed to operating its pipelines in a safe and reliable manner for the safety of all persons working and living around our operations.

Niska Gas Storage supports the activities as set forth in API RP 1162 and in accordance with the other applicable regulatory requirements concerning Public Awareness Program efforts.

Niska Gas Storage is committed to the activities as described in its Public Awareness Program.

Niska Gas Storage is committed to provide the appropriate level of funding and resources that are necessary to implement, maintain and as appropriate, enhance its Public Awareness Program.

Niska Gas Storage supports the efforts of its employees to conduct their individual work-related responsibilities safely and to contribute in complying with the requirements of the Public Awareness Program as described in this written document.

Mr. Simon Dupere

President, CEO, COO

Niska Gas Storage Partners LLC

June 15, 2012