

Compliance Program

Summit Midstream Partners, LP

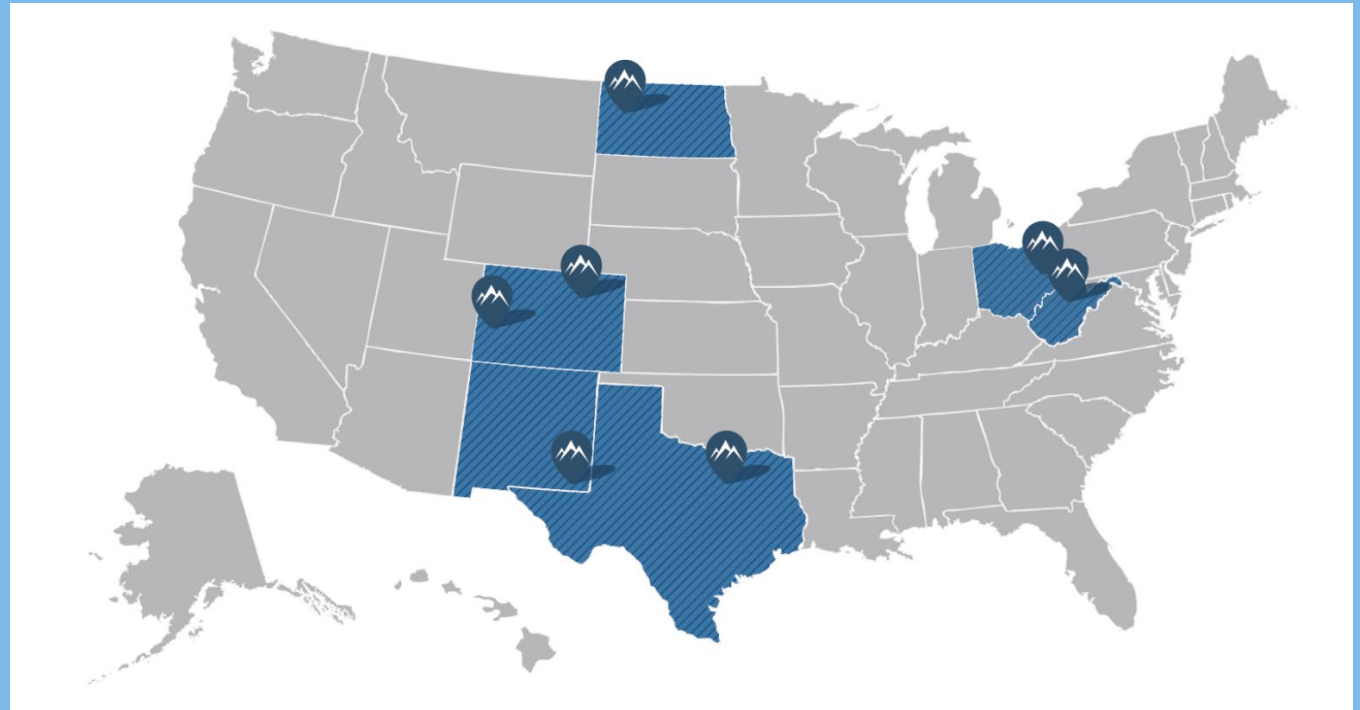


AGENDA

- Introduction
- How did we get here?
- Compliance Program Objectives
- Solution Overview & Architecture – Show and tell / reporting
- Challenges & Wins

Summit Midstream Partners, LP

Headquartered in Houston, Texas, Summit Midstream Partners, LP (NYSE: SMLP) is a value-driven master limited partnership focused on developing, owning and operating midstream energy infrastructure assets that are strategically located in unconventional resource basins, primarily shale formations, in the continental United States.



How Did We Get Here?



Summit Participating Teams

- Operations (All Assets)
- Asset Integrity and Compliance
- Operations Technology (Measurement and I&E)
- Health and Safety
- Environmental (Air, Waste, and Water)
- Information Technology
- Operational Excellence, and
- Legal

Summit Program Discovery

- The following disciplines were engaged: Regulatory, Safety, Measurement, Instrumentation and Electrical (I&E), and Environmental (air, water, and waste).
- Each discipline's record keeping documents and/or technologies were evaluated from a cost and user perspective.
- Federal, State, and Local regulations were identified.
- Identifying and defining roles and responsibilities of different teams at Summit.
- Review of internal procedures, systems, and tools used to comply with the obligations.
- The scope excludes some non-operational regulations such as Sarbanes-Oxley for accounting, Cyber Security for Information Technology, Human Resources, etc.

Discovery/Compiling LOTS of Data

- Review of each Discipline's record keeping and/or software
- Review of associated forms for tasks
- Review of auditor requirements
- Countless meetings with Discipline SMEs
- Meetings with any outside vendors that track information on Summit's behalf
- Compiling the "wish lists" from each discipline of what they'd like to see on their dashboards once everything is integrated into Maximo. Wish lists of reporting they want as well.
- Countless meetings with SMEs reviewing forms

Regulations

Discipline	Agency	Regulation	Compliance Enhancement Project Plan Page 5 Discipline	Agency	Regulation
Asset Integrity and Compliance	Federal / US Department of Transportation	49 CFR 191 – Incident Reporting 49 CFR 192 – Pipeline Safety Standards 49 CFR 194 – Pipeline Response Plans 49 CFR 195 – Transportation of Hazardous Liquids 49 CFR 199 – Drug and Alcohol Testing	Environmental – Air	Federal – Environmental Protection Agency (EPA)	40 CFR 60 – New Source Performance Standards 40 CFR 63 – National Emission Standards for Hazardous Air Pollutants 40 CFR 70 – Title V Operating Permits 40 CFR 98 – Mandatory Greenhouse Gas Reporting
Asset Integrity and Compliance	States: TX – RRC CO – PUC / GCC ND – NDIC NM – OCD WV – PSC OH – PUCO NE – NS Fire Marshal WY – PUC	TX: TAC Title 16 – Part 1 – Chap 8 and 16 CO: 4 CCR 723-11 Gas Pipeline Safety CO: GCC Rules 100 to 1200 ND: CC 43-02-03-29.1 Crude Oil and Production Water Underground PL ND: CC 43-02-03.30 Notifications NM: NMAC 18 CH 60 – Construction, Maintenance, and Operations NM: NMSA CH62 Art 14 – Damage Prevention WV: WV CH 24B / CSR 150-04 OH: OAC 4901 – 1 through 16 Gas Pipeline Safety NE: 155 NAC CH 1 and 2 NE: 291 NAC CH 9 NE: NRS 76.2301 to 2331 – One Call Requirements WY: WYS CR 37 Public Utilities	Environmental – Air	States: TX – TCEQ / RRC CO – CDPHE / GCC ND – NDDEQ / NDIC NM – NMED WV – WV DEP OH – OH EPA NE – NDEE WY – WDEQ	TX: 30 TAC Part 1 – Chap 1 through 122 (including permits) CO: 5 CCR 1001 – Regs 1 through 23 CO: GCC Rule 900 – Spill Reporting ND: NDAC 33.1-15 – Permits and Emission Standards NM: NMAC 20 CH 2 – Air Quality WV: 45 Series 1 through 44 – Air Quality Regulations OH: OAC 3745 – 14 through 114 Air Quality Regulations NE: 129 CH 1 through 16 – Air Quality Regulations WY: WYAR 020.0002 CH 3 through 14 – Air Quality Regulations RCRA – Industrial and Hazardous Waste
Asset Integrity and Compliance	Local: CO Weld County	WCC Charter and County Code CH 21 Art VI	Environmental – Waste	Federal – EPA	
Health and Safety	Federal: Occupational Safety and Health Administration (OSHA)	29 CFR 1910 – Occupational Safety and Health Standards 29 CFR 1910.119 – Process Safety Management (PSM) 29 CFR 1926 – Construction and Maintenance Standards 40 CFR 86 – EPA Risk Management Program (RMP) 49 CFR 300 to 399 – FM CSA – Motor Carrier Safety Administration	Environmental – Water	Federal – EPA Federal – US Army Corp of Engineers	401 and 404 Water Permits Water Quality Control Regulations
Health and Safety	State: NM – NMAC CO – CO GCC	NM: 11.4/NMSA 52.1 CO: 600 and 602 – Safety and Facility Operations Regulations	Operations Technology (Measurement and I&E)	Federal / Bureau of Land Management	43 CFR 3173 – Site Security and Product Handling 43 CFR 3174 – Liquid Measurement 43 CFR 3175 – Gas Measurement North Dakota Consent Decree
			Other	Federal US DOJ	

Maximo Regulatory Compliance Library

49 CFR § 191.17 - Transmission systems; gathering systems; liquefied natural gas facilities; and underground natural gas storage facilities: Annual report.

§ 191.29 National Pipeline Mapping System.

(a) Each operator of a gas transmission pipeline or liquefied natural gas facility must provide the following geospatial data to PHMSA for that pipeline or facility:

(1) Geospatial data, attributes, metadata and transmittal letter appropriate for use in the National Pipeline Mapping System. Acceptable formats and additional information are specified in the NPMS Operator Standards Manual available at www.npms.phmsa.dot.gov or by contacting the PHMSA Geographic Information Systems Manager at (202) 366-4595.

Part 192 Corrosion Enforcement Guidance

Introduction

The materials contained in this document consist of guidance, techniques, procedures and other information for internal use by the PHMSA pipeline safety enforcement staff. This guidance document describes the practices used by PHMSA pipeline safety investigators and other enforcement personnel in undertaking their compliance, inspection, and enforcement activities. This document is U.S. Government property and is to be used in conjunction with official duties.

The Federal pipeline safety regulations (49 CFR Parts 190-199) discussed in this guidance document contains legally binding requirements. This document is not a regulation and creates no new legal obligations. The regulation is controlling. The materials in this document are explanatory in nature and reflect PHMSA's current application of the regulations in effect at the time of the issuance of the guidance. In preparing an enforcement action alleging a probable violation, an allegation must always be based on the failure to take a required action (or taking a prohibited action) that is set forth directly in the language of the regulation. An allegation should never be drafted in a manner that says the operator "violated the guidance."

Maximo Regulatory Compliance Library

Regulation Filter > 1 - 20 of 349

Regulation	Level of Authority	Discipline	Description	Citation	Action	Frequency
10000	Federal	DOT PHMSA	Part 191 Reporting	191.17	Annual report	Annual
10001	Federal	DOT PHMSA	Part 191 Reporting	191.29	Annual submittal to NPMS due on March 15 of each year, showing assets as ... December 31 from the previous year	Annual
10002	Federal	DOT PHMSA	Subpart I Corrosion Control	192.455	Cathodic protection surveys and isolation testing	Annual
10003	Federal	DOT PHMSA	Subpart L Operations	192.605(c)(4)	Operations and the HSE&R shall review the response of operator personnel to determine the effectiveness of the procedures	Annual
10004	Federal	DOT PHMSA	Subpart L Operations	192.609	SMLP is required to perform class location studies	Annual
10005	Federal	DOT PHMSA	Subpart L Operations	192.614 (a), (b)	Damage Prevention Plan requirements	Annual
10006	Federal	DOT PHMSA	Subpart M Maintenance	192.614 (a), (b)		
10007	Federal	DOT PHMSA	Subpart N Qualification of Pipeline Personnel	192.614 (a), (b)		
10008	Federal	DOT PHMSA	Subpart O Pipeline Integrity Management	192.614 (a), (b)		
10009	Federal	DOT PHMSA	Subpart O Pipeline Integrity Management	192.614 (a), (b)		
10010	Federal	DOT PHMSA	Subpart O Pipeline Integrity Management	192.614 (a), (b)		
10011	Federal	DOT PHMSA	Subpart O Pipeline Integrity Management	192.614 (a), (b)		
10012	Federal	DOT PHMSA	Subpart O Pipeline Integrity Management	192.614 (a), (b)		
10013	Federal	DOT PHMSA	Subpart O Pipeline Integrity Management	192.614 (a), (b)		
10014	Federal	DOT PHMSA	Subpart O Gas Transmission Pipeline Integrity Management	192.614 (a), (b)		

← List View Regulation Log Where Used

Regulation: 10000

Part 191 Reporting

Citation: 191.17

Action:

Annual report

Frequency: Annual

Level of Authority: Federal

Valid From: 01/08/23

Expiration Date:

Discipline: DOT PHMSA

Revision: 0

← List View Regulation Log Where Used

Regulation: 10000

Part 191 Reporting

Status: ACTIVE

Organ

Assets Locations Job Plans Hazards Permit and Certificate Types Operating Policies Operating Procedures Items PMs

PMs Filter > 1 - 6 of 6

PM	Description	Site
20017	Annual Report	

Preventive Maintenance Lindsay Janek

[List View](#)
[PM](#)
[Frequency](#)
[Seasonal Dates](#)
[Job Plan Sequence](#)
[PM Hierarchy](#)
[Forecast](#)
[Regulations](#)
[Forecast Cost](#)
[Table View](#)
[Audit Data](#)

+PM: 18385 Site: DALLAS Status: DRAFT

Regulations [Filter](#) 1 - 1 of 1

Regulation	Description	Regulation Number	Regulation Type	Regulatory Authority
Regulation Details				
+Regulation: Revision:				
Regulation Number:				
Regulation Sub-Section:				
Regulation Type:				
Regulatory Authority:				
Regulatory Region:				
Regulatory Country:				
Select Regulations		New Row		

Select Value 1 - 20 of 333

Regulation	Description	Applies To	Regulation Type	Organization	Site
10000	Part 191 Reporting	GENERIC	DOT PHMSA		
10001	Part 191 Reporting	GENERIC	DOT PHMSA		
10002	Subpart I Corrosion Control	GENERIC	DOT PHMSA		
10003	Subpart L Operations	GENERIC	DOT PHMSA		
10004	Subpart L Operations	GENERIC	DOT PHMSA		
10005	Subpart L Operations	GENERIC	DOT PHMSA		
10006	Subpart M Maintenance	GENERIC	DOT PHMSA		
10007	Subpart N Qualification of Pipeline Personnel	GENERIC	DOT PHMSA		

Regulations Tab added to Preventive Maintenance Application

Forms

IBM Maximo Asset Management Manage Inspection Forms

Hide optional questions? No **Control Valve Test Form** ⓘ

All Incomplete Completed

Control Valve Test Form ○

- 1. Calibration Device Info ○
- 2. Calibration Info ○
- 3. Recalibration / Replacement Parts & Valve Info ⓘ
- 4. New Replacement Valve Info ⓘ
- 5. Calibration Final Checks ○
- 6. Sign Off ○

0/15 Total • 0/12 Required

[Exit](#) [Complete](#)

1. Calibration Device Info

* 1.001. What type of Calibration Device are you using?

*What type of Calibration Device are you using?

✓ [Redacted]

✓ [Redacted]

✓ [Redacted]

1.006. Valve Travel:

Valve Travel: [Redacted]

1.007. Valve Bench Set:

Valve Bench Set: [Redacted]

Inspection Form Library

30 of 108 Results

[Create form](#)

01 Notice of Activity [Redacted] Revision 6 - 15/11/23 12:26 PM Active	01 Notice of Activity (Copy) [Redacted] Revision 3 - 23/02/24 10:59 AM Inactive	06 Critical Valve Inspection [Redacted] Revision 3 - 18/02/24 11:02 AM Active	12 Public Official Liaison Contact [Redacted] Revision 2 - 17/11/23 7:40 PM Active	130 Encroachment-Foreign Line Crossing [Redacted] Revision 1 - 30/11/23 4:19 PM Active
140 Maintenance [Redacted] Revision 4 - 14/11/23 5:04 PM Active	140.a Maintenance (Internal/External Inspection Only) [Redacted] Revision 3 - 05/12/23 11:25 AM Active	143 Emergency Log [Redacted] Revision 1 - 01/12/23 9:51 AM Active	145 Leakage Survey [Redacted] Revision 1 - 30/11/23 5:05 PM Active	146 Pipe Movement [Redacted] Revision 1 - 01/12/23 10:03 AM Active
148 - Adjacent New Construction [Redacted] Revision 4 - 14/11/23 5:21 PM Active	149 Pipeline ROW Activity/Inspection [Redacted] Revision 1 - 01/12/23 10:23 AM Active	15 OPP Device Inspection [Redacted] Revision 2 - 17/11/23 7:56 PM Active	15 OPP Device Inspection (Copy) [Redacted] Revision 1 - 28/11/23 3:32 PM Draft	154B Cathodic Protection Data Sheet [Redacted] Revision 2 - 17/11/23 7:57 PM Active

Compliance Dates in Maximo and Not to Exceed

Lead Time (Days): 90

Compliance Window: 120

Lead Time Active?

Adjusted Due Date?

Include this PM in the Forecast?

Job Plan: 1126 > Description: Relief Valve inspection

Work Type: PM 🔍 Last Start Date: 18/03/24 📅

Department: Operations 🔍 Last Completion Date: 04/01/23 📅

+ **Work Order Status:** APPR 🔍 Earliest Next Due Date: 18/03/25 📅

Priority: 2 🔍 Compliance Deadline: 16/07/25 12:00 AM 📅

Consolidated Recordkeeping for Auditor

- SharePoint
- No hunting or pecking
- Maximo and SharePoint are now integrated

Inspection Form Report		WO: 327726
Asset: 10-01-0002-01		Cowboy Run 2
Inspection #: 1360	Inspection Status: COMPLETED	Inspection Date: 01/15/2024

2 Calibration Info

Yes - I need to record the new CV's Asset data

2.002 New CV Asset Data: *New CV Installation Date:*
Mar 13, 2024

2.002 New CV Asset Data: *New CV Manufacturer:*
Miller

2.002 New CV Asset Data: *New CV Model:*
ML-1090

2.002 New CV Asset Data: *New CV Serial #:*
19-090

2.002 New CV Asset Data: *Was new CV a like for like replacement?*
Yes

2.002 New CV Asset Data: *If new CV was not a like for like replacement, please explain:*

2.003 Calibration 0% - Apply medium to move valve to 0% open position & enter As Found Calibration 0% - As Found position of CV (%):
23

2.004 Calibration 25% - Apply medium to move valve to 25% open position & enter As Found Calibration 25% - As Found position of CV (%):
23

2.005 Calibration 50% - Apply medium to move valve to 50% open position & enter As Found Calibration 50% - As Found Position of CV (%):
23

2.006 Calibration 75% - Apply medium to move valve to 75% open position & enter As Found Calibration 75% - As Found Position of CV (%):
23

2.007 Calibration 100% - Apply medium to move valve to 100% open position & enter As Found Calibration 100% - As Found Position of CV (%):
23

2.008 As Found Tolerances: *Are any As Found positions outside of the acceptable range of +/- 5%?*
No

2.009 Calibration 0% - Apply medium to move valve to 0% open position & enter As Left Calibration 0% - As Left position of CV (%):
24

2.010 Calibration 25% - Apply medium to move valve to 25% open position & enter As Left Calibration 25% - As Left position of CV (%):

Launch Entry Name: _____

Repair Facility: _____

Repair Facility Site: _____

Job Details

Job Plan: 1156 > Instrumentation

Job Plan Revision #: 2

PM: 8991 >

Safety Plan: >

Contract: >

Regulator: _____

Inspection Form: 1001 >

Inspection Result: 1078 >

Total Work Units: 1.00

Work Package Mater

Material Status Last

Reports and Schedules

Reports Schedules

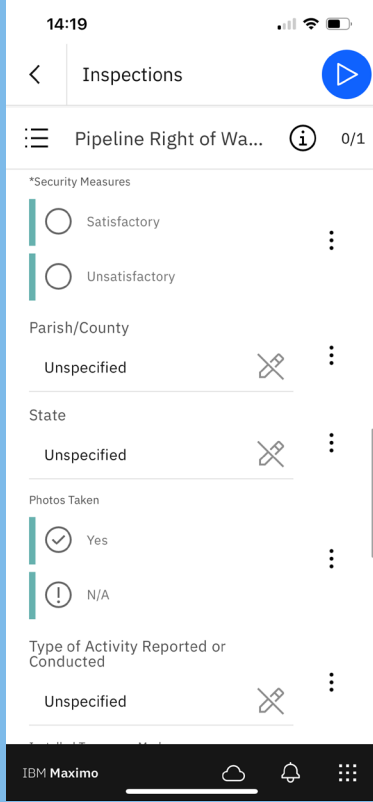
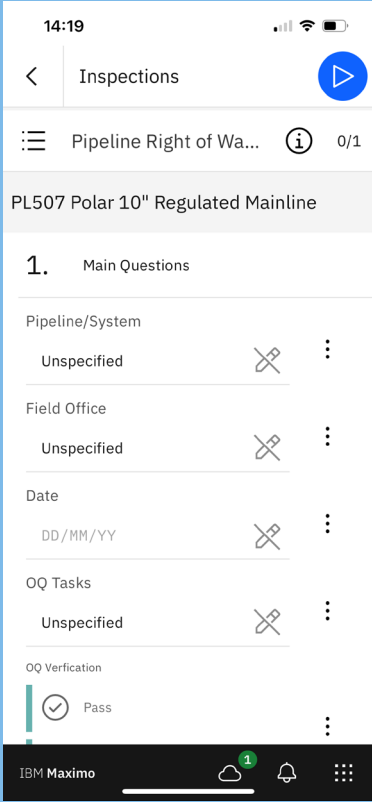
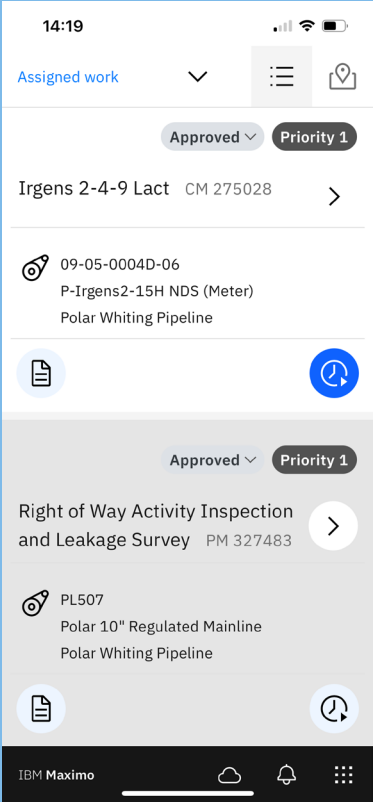
Filter > < 1 - 5 of 14 >

Description

- Calibration Work Order Data Sheet
- Custom Work Order List
- Estimated vs Actual Work Order Costs
- Inspection Form Report
- Jared Valerio Open Work Orders

Create Report Cancel

Maximo Mobile



Challenges & Wins

CHALLENGES:

- No one likes change.
- Getting groups to participate.
- Getting FEEDBACK! Silence is acceptance?
- Getting beyond the "Born Before Computers" mind-set.

WINS:

- Support from CEO/COO.
- Uniformity across the board.
- Advanced technology to make working smarter, not harder.
- PROOF that we are 100% Compliant! If not, bells and whistles!