

# Being Proactive to Enhance DP Programs



### What we'll cover:

- Reporting culture vs. Prevention culture
  - What the "near-hits" can tell you
- Corrective and Preventive Actions – why they matter
  - What questions is your program asking?
- Connecting land use monitoring to the DP Program



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## Damage Prevention and Safety Culture

### Damage Prevention is a fundamental part of Safety Culture

#### For people living and working near pipelines DP is:

- Planning for a safe outcome
- following DP best practices,
- making a locate request,
- Receiving consistent, appropriate information
- communicating with the pipeline companies (requesting consent when required)
- following the safety measures and more

#### For companies:

Planning for safe outcomes by:

- following DP best practices,
- assessing the activity for DP safety,
- providing safety measures and so much more...
- Management systems requirements to anticipate and mitigate hazards
- Patrolling and monitoring the pipeline
- Public awareness programs
- Communicating with stakeholders
- Trending and analyzing UA data
- Continual program improvement

Yes the company list is much longer – way longer than what is written here; damage prevention is a shared responsibility, but the companies share of that responsibility is the largest.

- Management system requirements in the OPR (s.6.5)
- Damage Prevention and PA program requirements in the DPR-O s.16 –

# DPR Contravention Reporting (UAs)

## Obligation to Report

### Section 11

#### Report to Regulator

11 (1) The pipeline company must immediately report to the Regulator

(a) **every contravention** of the Canadian Energy Regulator Pipeline Damage Prevention Regulations – Authorizations;

(b) **all damage to its pipe** caused or identified during the construction of a facility across, on, along or under a pipeline, the operation, maintenance or removal of a facility, an activity that caused a ground disturbance within the prescribed area or the operation of vehicles or mobile equipment across the pipeline; **and**

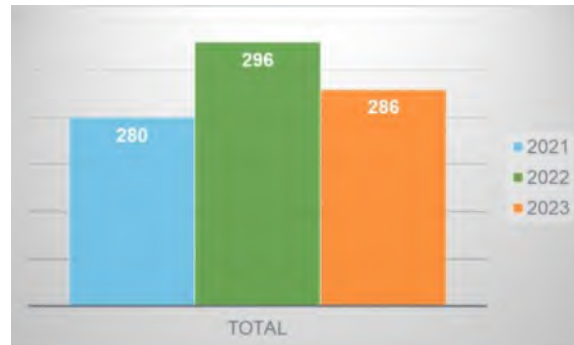
(c) **any activity** related to the construction of a facility across, on, along or under a pipeline, an activity that caused a ground disturbance within the prescribed area or the operation of vehicles or mobile equipment across a pipeline that the pipeline company considers **could impair the safety or security of the pipe**.

This is a lot – we all know it but (next slide)...

## DPR Contravention Reporting (UAs)

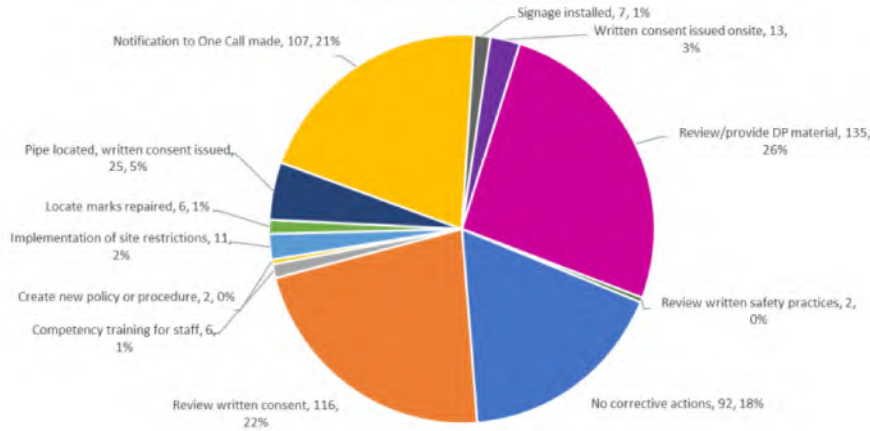
Kudos to all of you who have been meeting the regulatory requirements to report all contraventions of the DPRs.

Good reporting is essential for identifying trends and improving damage prevention outcomes.



\*2023 to Q3

### Corrective Actions



A lot of the "No corrective actions taken" of (18%) can be accounted for in activities where you can't find the contravener – evidence of vehicle crossings are a good example of this.

"Reviewing and providing written material" and "Notification to One Call" account for nearly half of the corrective actions – what can we learn from that? It looks like it may be appropriate to work on something in the Public Awareness space if these third parties don't know what they should be doing.

22% of corrective actions are "Reviewing written consent" which gets back to our Safety moment earlier on – that written safety information isn't getting where it is needed, or in the readable format that is needed – what can be done to improve that?

## Report....and then what?

We need to shift from a reporting mindset to a **Prevention** mindset

Corrective and preventive actions –

- Rarely anything in the data indicating a learning system
- Often focused on the 3rd party only
- Rarely evidence of looking at internal systems and processes

One thing that we have learned from contravention/UA reports:

An average of 24% of reports over the past 2 ¾ years has listed the immediate cause as "Written consent issue"

An example of this reporting mindset: we got a UA report in October that had "Inspector issued the unauthorized activity" in the "Immediate actions taken by company" section and that was it; no more actions taken. That is a reporting culture – reporting only provides data to identify indicators in the longer term, but does nothing to prevent anything from happening to the pipe or the people.

If 24% of reports list "written consent issue" it is really worth your time to look at ways to ensure the safety information is getting to the 3rd party in a way that they can understand – it's low hanging fruit that could improve prevention outcomes significantly.

51% of reports 2021 to Q3 have **no** Tier 1 preventive actions

32% do a holistic analysis of company policies to see if modification is required

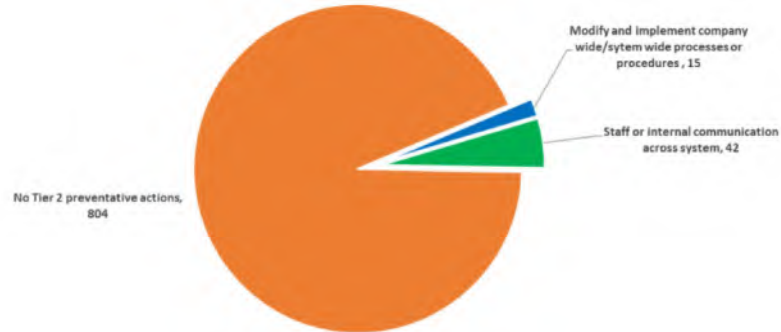
1% make a change to policies or standard



You know, if we see that changes are being made to programs after analyzing your data – that's a good thing. It means that you are using the data to inform your program, you're learning and adapting your programs to meet the needs.

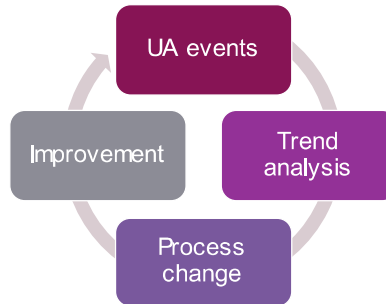
93% of reports 2021 to Q3 have no Tier 2 preventive actions

### Tier 2 Preventive Actions



Again, it's good to see that in some cases there is internal communication across the system, and times when processes or procedures are being improved. We are actively looking to see where company's programs and systems are growing and improving.

It's important that companies look at more than 3rd party causes.  
What else can you look for?



How can the company improve processes, communications or training?

If you are improving your processes as a result of something identified from trend analysis it's actually a good thing! In order to be effective, look at more than 3rd party causes, but even if it is a 3rd party issue, how can you get in front of it? If your current PA program isn't getting the message out, how can you improve on that?

## Near hits (UAs) are Learning Opportunities



If landowners are "unaware of regulation" as we see in a lot of contraventions, what are companies doing about it? (Not just adding them to the mailing list)

We aren't seeing companies take advantage of these opportunities – using the high potential near hits as learning opportunities. Near hits are another way of saying DPR Contraventions – especially ground disturbance contraventions.



**Homework assignment:**

What are the top three trends your company identified from near hits?

What is your trajectory for continual improvement?

What can be done differently to get better results?

## Connecting patrolling and monitoring data to the DP Program

Knowing the land use near the pipe and communicating with municipalities is essential for knowing what changes are coming up.

Changes can be:

- large scale – undeveloped field or forest to a new neighbourhood, or
- small scale – empty lot to a new building

What indicators does your land use monitoring program and pipeline patrols use to trigger activities when are there that a change in land use is coming?

What activities are triggered?

As you all know, Land use monitoring is a regulatory requirement. When Municipalities do their land use planning, they look decades into the future – it may not seem that way but their high level plans start out with a 40 year look ahead and they often zone land years ahead of any actual change in land use. Zoning is not the only tool – your patrolling and monitoring activities play a major role in knowing what's happening near your pipeline. So what are your patrols looking for and reporting on that trigger company action? What are those actions? Requests for consent (single request? Clusters?) can trigger increased patrols, PA activities and other activities. You are patrolling and monitoring the ROW – are there signs for new development? Other changes on or near the ROW?

## Connecting patrolling and monitoring data to the DP Program

### Pop Quiz – Question 1





You've seen the signs adjacent to the ROW for a new neighbourhood being developed what do you do?

- a) Look for Developer contact information on the sign and offer to do education sessions with contractors ✓
- b) Increase company presence – Patrols, signage, education, meet & greets ✓
- c) Other suggestions? ✓
- d) Wait for the developer to start digging and hit them with a UA ✗

## Connecting patrolling and monitoring data to the DP Program

### Pop Quiz – Question 2

The water, sewer and other infrastructure near your pipe has gone in and they're starting to build houses; what actions should that trigger in your DP Program?

- a) Wait for the builders to start digging without consent and issue a UA 
- b) Proactively find out which builders are in the development and work with them to ensure safety of people and pipe 
- c) Look for Developer contact information on the sign and offer to do education sessions with builders 
- d) Increase company presence – Patrols, signage, education, meet & greets 

## Connecting patrolling and monitoring data to the DP Program

### Pop Quiz – Question 3

The houses are popping up left right & center; what activities can be anticipated from the new homeowners?

- a) Landscaping – driveways, lawns & trees
- b) Fences
- c) Decks and various outbuildings



What actions should that trigger in your DP Program?

- a) Increase company presence with a homeowner focus – Patrols, signage, education, meet & greets
- b) Swag leaves a lasting impression :)



Let your imagination go a little, how can the company make an impression on the neighbourhood so that they know what to do before they start all of these activities? What about a block party? Just an idea – not a regulatory requirement, but it's certainly thinking out of the box.

## Connecting patrolling and monitoring data to the DP Program

### Pop Quiz – Question 4


There is a major construction project about to start adjacent to your pipeline; what actions are identified in the company's DP process? What do you do?

- a) Fence off your ROW to prevent vehicle crossings and inadvertent digging ✓
- b) Increase patrol frequency ✓
- c) Bury the safety information in schedule C of the crossing agreement and hope all of the subs read it ✗
- d) Wait for the developer to start digging and hit them with a UA ✗
- e) Require all contractors and subs to do education sessions of varying levels ✓

## Connecting patrolling and monitoring data to the DP Program

### Pop Quiz – Question 5

Pipeline patrolling can only be done from the air

- a) True
- b) False 

Pipeline patrol can be done in a variety of ways, including driving, walking, or by air. As long as the goals in CSA Z662 s.10.6.2.1 Pipeline Patrolling are met.

Something that came up recently is that air patrol is often unable to patrol the lines that run near or into airports as air traffic control prohibits those types of flights near airports – that's a major gap.

Often it's more effective to patrol by vehicle when the pipeline is in a road allowance, and/or in an urban area.

## Connecting patrolling and monitoring data to the DP Program

Don't be limited in your thinking; innovate!



We'd love to hear what you are doing, and novel approaches to solving problems

Continual improvement comes from the people doing the work – you see these situations up close and personal. It's natural to be defensive and put all of the blame on the 3rd party; but real prevention happens when you put that aside and really look at how you can get in front of the problem and keep it from happening in the first place. That takes innovation and creative thinking. It may feel like you are holding their hand through the process, but that may be what it takes to keep them and your pipeline safe.

We'd love to hear how you're approaching pipeline patrolling and monitoring and how the data from those programs is used and how it all works together. There are openings in our next workshop agenda where we can all learn new ways to prevent damage and connect with third parties.