



PHMSA Underground Natural Gas Regulatory Compliance

SCOPE: A leading midstream company in the Energy industry required an underground storage program. The program needed to align with the U.S. Department of Transportation's Pipeline and Hazardous Materials Safety Administration's (PHMSA) interim final rule (IFR) which requires operators to implement and comply with American Petroleum Institute (API) Recommended Practices (RP) 1170 and 1171.

SPARK THOUGHT was asked to create the company's compliance program to meet PHMSA IFR. Beginning with our trademarked S.P.A.R.K. process, we:

1. Educated the client on the details of PHMSA IFR and Recommended Practices.
2. Collaborated with key stakeholders to discuss the current state of their compliance program, their desired compliance state, related concerns and parameters, and follow-up training needs.
3. Completed a thorough gap analysis of the client's current state to determine the full scope of their specific compliance program needs. This included developing a compliance matrix that identified gaps in regulatory documentation based on a thorough review of the documentation required by API RP 1170 and RP1171.

PLAN: Our Regulatory Compliance and Documentation Specialists formulated a detailed plan to create full compliance with PHMSA's IFR. The plan also addressed implementation and related training needs and flexible client-collaborative workshop times respecting the client's schedule.

ACTION: Some of the actions we took to meet the client's unique needs connected to PHMSA's IFR were:

1. Collaborating with the company's Subject Matter Experts (SMEs) to thoroughly examine the existing Operations and Maintenance Manuals (O&M) and address necessary revisions and additions of PHMSA IFR-compliant material
2. Creating necessary documentation to update and expand their existing O&M Manuals
3. Integrating and reorganizing documentation into their existing O&M Manuals
4. Collaborating with the company's management to address and create follow-up implementation and training needs
5. Developing training materials on the new material.
6. Providing training services

REVIEW: We used our five-point project review and delivery check on our compliance program solution including:

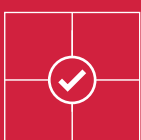
1. Measuring and verifying that all client's compliance needs were met
2. Evaluating the degree to which our compliance program solution met the client's needs
3. Resolving any remaining gaps in our solution to ensure full compliance
4. Refining the overall quality of documentation and related materials created
5. Ensuring on-time product delivery

KNOWLEDGE: Our valued client achieved full compliance with the IFR. Impressed with the results of our client-centered SPARK process and our outstanding project turn-around time, this client has connected with **SPARK THOUGHT** on several additional projects, secure in the knowledge that we understand their unique needs and have their best interests in mind. They know they can rely on us for unparalleled attention to detail, flexible collaboration, and complete dedication to meeting client needs with cost-effective, high-quality deliverables.

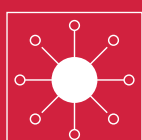
SPARK THOUGHT has broad experience helping major organizations and corporations assess regulatory compliance needs and implement frameworks that are customized to address their specific needs. We have performed regulatory compliance gap analyses for oil and gas companies, created written procedures to cover new regulations, designed new forms and records management processes, assisted with preparation for government audits, and generated course materials for compliance training.

We listen. We collaborate and innovate. We deliver customized Knowledge Management Solutions.

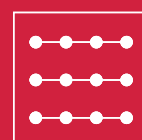
PROJECT
GOALS



Assured
Compliance



Document
Consolidation



Guaranteed
Consistency