

# OPERATOR QUALIFICATION HISTORY & MILESTONES

## **I. The Mandate**

The Operator Qualification (OQ) Program stems from a mandate in 1992 and continues through present Pipeline Safety Acts. Based on concerns from Congress, current event accidents, the Act of 1992, and again in 1996, the Office of Pipeline Safety developed regulations addressing OQ. Based on the wording associated with the Acts, specific areas, such as operating and maintenance tasks, were required language in the pending regulation. Also, it was emphasized that the ability to recognize and react to abnormal operating conditions is imperative.

Initially in 1994, the old rulemaking approach was initiated and out of this came a training proposed rule. Industry, through negotiation, indicated that the vast majority of employees were presently qualified and capable of doing the jobs tasked by the operator. In turn, there was concern about subjecting employees to hours of training when, in fact, they were already qualified. The regulatory side concurred and requested a verification process be established for employees to substantiate their qualification.

## **II. Notice of Proposed Rulemaking**

The Notice of Proposed Rulemaking (NPRM) on OQ requires pipeline operators to develop and maintain a written qualification program for individuals who perform covered tasks on pipeline facilities. The intent of this qualification rule is to ensure a qualified workforce and to reduce the probability and consequence of incidents caused by human error. The NPRM proposes to create new subparts in the gas and hazardous liquid pipeline safety regulations. Although no regulatory program is capable of completely eliminating human error, the objective of the proposed rule was to reduce the risk of accidents on pipeline facilities attributable to human error. It is intended to provide an additional level of safety and would require operators of pipelines to develop a qualification program to evaluate an individual's ability to perform covered tasks and to recognize and react to abnormal operating conditions that may occur while performing covered tasks.

## **III. Intent of the OQ Rule**

The intent of the OQ Rule is two-fold: 1) to ensure a qualified workforce on jurisdictional pipelines, and thereby, 2) reduce the probability and consequence of pipeline incidents or accidents caused by human error. Thus, OQ is not intended to be a one-time event, but a process that continues for the working lifetime of an individual. After initial evaluation and qualification have been completed, there will be a point in time where re-evaluation and requalification will be required. The operator must recognize this and designate for each covered task an appropriate time interval for requalification. In addition to being evaluated for the technical competence to

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adequately perform a covered task, qualification of the individual must include the ability to recognize and react to abnormal operating conditions. All pipeline operators subject to Parts 192 and 195 are covered by the OQ Rule and are responsible for ensuring that any employees, contractor employees, subcontractor employees, etc., performing covered tasks on their pipeline are qualified in accordance with the Rule, or are only allowed to perform those tasks while under the direct observation of someone who is qualified. As of October 28, 2003, operators are expected to have completed the required written qualification program and to have qualified all personnel who perform covered tasks.

## **IV. Pipeline Employee Performance Group (PEPG)**

In addition to RegNeg, numerous meetings, ad hoc conferences, in-house workgroups, and the Pipeline Employee Performance Group (PEPG) helped to establish just what the safety issues were and the performance approach to meeting the new regulations. The initial effort chosen by the PEPG was the new OQ requirement. The PEPG initially developed lesson objectives, a multitude of slide presentations, and outline materials on OQ that were made available on TSI's web site to ensure consistency throughout the industry. Eventually an OQ Team was formed (Richard Sanders and Warren Miller of RSPA, Paul Wood and Dave Waters of Cyclo). They began reviewing operator OQ plans for best practices. At the last meeting in September 2002, Paul Woods presented the OQ protocols issue to PEPG members. He offered examples of some of the issues such as re-evaluation intervals and evaluator requirements, contractor evaluation process, change of management, etc. Members broke into groups to compile a list of what they believed some of the major issues differentiating a good program from others. They identified and ranked major 1<sup>st</sup> round issues that would be significant for inspectors. They also developed written discussion on how a responsible operator would resolve and deal with each issue. The prioritized list was discussed, some redundancy was noted, and members again broke into groups to refine issues. After hearing that this information would be provided to OPS and inspectors, Gary Cowden, Phil Bennet (AGA), and remaining PEPG members voted to retract input. No additional PEPG meetings were held.

## **V. OQ Inspections**

To aid in the inspection of operators against provisions of the OQ Rule, the OQ Team conducted a number of fact-finding visits during the February/March 2003 timeframe. They visited several facilities to better understand "off-the-shelf" programs, to learn how the programs direct operators to implement OQ requirements, and to seek noteworthy practices associated with these programs. In addition, they identified shortcomings in the programs that could compromise compliance with the OQ Rule. The results of these fact-finding visits were documented and provided to inspectors for use in evaluating operators using an off-the-shelf program. Inspectors

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will likely use these insights to focus their inspections on both potentially weak and strong aspects of their program. In addition, an OQ matrix was developed by TSI, breaking out inspection mileage by region, state, and operator.

## **VI. OPS Public Meetings on OQ**

OPS held four public meetings on operator qualification, which resulted in the development of inspection protocols and the recognized need for a consensus standard. The OQ Team held planning meetings, teleconferences, broadcasted panel discussions, fact-finding and consortium visits, and operator enforcement inspections. This initial effort and joint participation with industry also resulted in further development of protocols and inspection forms, which were updated to address small gas systems. The protocols assist federal and state pipeline safety inspectors in evaluating operators' OQ programs and are used in the course of their rigorous inspections to ensure compliance with all prescriptive requirements of the OQ Rule. The protocols and inspection forms were the basis for developing a comprehensive OQ CBT course for federal and state inspectors. The CBT course involves an online test for satisfactory completion and enabled 450 plus pipeline safety inspectors to be adequately trained prior to taking over inspections in January 2004. The OQ CBT was presented at the NAPS Board Meeting in Sunset Beach, September 8, 2003, and shipped to inspectors on October 8, 2003.

## **VII. Development of Protocols, Inspection Forms, and Supplementary Guidance**

The protocols, inspection forms, supplementary guidance, etc., were communicated to the public via the TSI web site. The joint efforts of the OQ Team have made possible the formation of an OQ database that compiles inspection data and statistics, and provides reports by operator ID, state, region, miles of pipeline inspected, and notes on record keeping, evaluation methods, etc. To date, natural gas and hazardous liquid pipeline companies operating 250,000 plus miles of pipeline have been inspected throughout the nation.

## **VIII. Lessons Learned**

OQ Lessons Learned were developed during the final OQ Federal/State Inspection Team reset meeting held February 10-13, 2004. The document outlines collaborative resolution of regulatory issues, communication among regulators, promoting inspection consistency, industry implementation effectiveness and concerns, and remaining problem areas.

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## **IX. ASME B31Q Consensus Standard Committee & RegNeg**

The development of this standard originated from regulatory action in the U.S. from 1987 through 2003. The background would not be complete without a review of regulatory action. In 1987, the U.S. Department of Transportation (DOT) issued a notice inviting public comment on the need for additional regulations or a certification program for the qualification of personnel who design, construct, operate and maintain gas or hazardous liquid pipelines. Shortly thereafter, work began in Congress to amend the Pipeline Safety Laws to include operator qualification requirements. The Pipeline Safety Act of 1992 included language to that effect, requiring that all personnel responsible for the operation and maintenance of pipeline facilities be tested for qualifications and certified to operate and maintain those facilities.

In response to the above congressional action, DOT published a Notice of Proposed Rulemaking (NPRM) in 1994 to establish specific training requirements for the qualification of pipeline workers. This training rule met with varying responses including a petition for withdrawal of the NPRM from pipeline industry representatives. In the meantime, Congress amended the 1992 law with the Pipeline Safety Improvement Act of 1996 requiring simply that all individuals who operate or maintain pipeline facilities be qualified. In addition, this Act required that the qualifications address the ability to recognize and react appropriately to abnormal operating conditions that may indicate a dangerous situation or a condition exceeding design limits. In 1996, DOT withdrew the 1994 proposed rulemaking and simultaneously issued a notice to form a negotiated rulemaking committee to develop a final rule on the qualification of pipeline personnel.

The negotiated rulemaking process (RegNeg) was intended to provide an opportunity for all affected parties to present their views and reach a consensus on a proposed qualification rule. The Federal Mediation and Conciliation Service was hired to convene and facilitate negotiated rulemaking (RegNeg) meetings between stakeholders. The RegNeg was comprised of gas and hazardous liquid pipeline representatives, Federal and State Government agencies, labor organizations, public interest groups, and emergency response representatives. The Committee established ground rules that would be implemented in the negotiated phase.

RegNeg focused on participation, decisionmaking, and consensus decisions. Throughout the entire process, a negotiation and consensus approach was undertaken. The decision to withdraw a training rule and initiate a qualification rule stemmed from the following guidelines:

- \$ Qualification is an end; training is the means to an end.
- \$ Qualification results from evaluation; training does not necessarily result in qualification.

The committee met several times from 1997 through 1999, when consensus on the final rule was reached.

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The Final Rule was not prescriptive, and the resulting flexibility built into the performance-based rule made it difficult to measure operators' compliance with the Rule. This led to the development of "protocols" to assist regulators in the evaluation of qualification programs. Protocols were developed after a series of public meetings in 2003; however, differences still existed between the pipeline industry and DOT regarding the implementation, inspection and subsequent enforcement of the operator qualification rule. Both groups committed the development of a national consensus standard on operator qualification, where the outstanding issues could be resolved and a technical basis for personnel qualifications could be established.

The pipeline industry approached ASME International seeking a sponsor for the development of a national consensus standard on pipeline operator qualification. The ASME Code for Pressure Piping, B31 Committee formed the B31Q Project Team on Qualification of Pipeline Operators. This project team met for the first time in August 2003 and began the task of crafting a technically based standard for the qualification of pipeline personnel.

The purpose of this standard is to provide general and specific requirements for the qualification of pipeline personnel. The implementation of this standard is intended to minimize pipeline failures caused by human error. Suggestions for the improvement of this Standard are welcome and should be addressed to The American Society of Mechanical Engineers, Secretary, B31 Main Committee, Three Park Avenue, New York, NY 10016-5990. An additional paragraph will be added to summarize B31Q Project Team activities and results once their work is complete.

## X. Timeline

The timeline below provides an overview of the work and effort that has taken place since the Act of 1990 to present. Significant events and milestones are bolded.

<b>Negotiated Rule Making Act</b>	<b>1990</b>
<b>Pipeline Safety Act</b>	<b>1992</b>
<b>Regulatory Reinvention Initiative</b>	<b>March 4, 1995</b>
<b>Notice of Intent (61 FR 34410)</b>	<b>Jul 2, 1996</b>
<b>Notice of Withdrawal (61 FR 34413)</b>	<b>Jul 2, 1996</b>
<b>Notice of 1<sup>st</sup> RegNeg Committee Meeting (62 FR 7985)</b>	<b>Feb 21, 1997</b>
PEPG Formation (1 <sup>st</sup> Meeting at TSI, OKC)	Feb 26-28, 1997
PEPG Meeting on OQ	Jun 11-12, 1997
PEPG Meeting on OQ	Oct 22-24, 1997
<b>RegNeg Meeting on OQ (AGA/OPS HQ, Arlington, VA)</b>	<b>Jan 25-29, 1998</b>
PEPG Work Group Meeting on OQ (TSI OKC)	Mar 9-12, 1998
AGA/INGAA Joint Workshop-OQ Presentation (Washington, DC)	May 4, 1998
OQ Symposium (Houston, TX)	Aug 4, 1998
<b>Pipeline OQ Conference (Houston, TX)</b>	<b>Aug 31-Sep 3, 1998</b>

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Louisiana Gas Association OQ Discussion (New Orleans, LA)	Oct 22, 1998
<b>NPRM (98-3783 – Notice 1)</b>	<b>Oct 28, 1998</b>
Russian Delegation (SABIT Oil) Tour & Participation in PEPG OQ Meeting @TSI	Nov 9-10, 1998
APGA OQ Conference (Lexington, KY)	Nov 9-10, 1998
Distribution Contractors Association Meeting on OQ	Jan 5-6, 1999
PEPG Meeting on OQ (Las Vegas, NV)	Jan 13-15, 1999
APGA Conference on OQ	Feb 1999
Texas Gas Association Meeting on OQ	Feb 3-4, 1999
OPS OQ Meeting (Reconvene RegNeg) (DOT OPS HQ)	Feb 22-24, 1999
MEA Conference on OQ (Phoenix, AZ)	Mar 1-5, 1999
PEPG Meeting on OQ (Las Vegas, NV)	Mar 29–Apr 1, 1999
OQ Meetings at GA PSC & Municipal Associations (Macon, GA)	April 5-7, 1999
Telecon with Equilon Pipeline on OQ	May 5, 1999
National NAPSRS Meeting (Springfield, IL)	May 24-27, 1999
Southern Gas Association Professional Roundtable on OQ (Memphis, TN)	Jun 14-18, 1999
Eastern Regional NAPSRS Meeting (Saratoga Springs, NY)	Jul 19-21, 1999
API Audit & Enforcement Conference (Houston, TX)	Jul 20-21, 1999
MEA Conference	Aug 2-6, 1999
Louisiana Municipal Association Conference on OQ	Aug 12-14, 1999
Western Regional NAPSRS Meeting (Las Vegas, NV)	Aug 30–Sep 3, 1999
Clarion Technical Conference on OQ (Houston, TX)	Aug 30–Sep 1, 1999
Mississippi Natural Gas Association Meeting on OQ	Sep 7-8, 1999
Central Regional NAPSRS Meeting (St. Louis, MO)	Sep 13-17, 1999
Florida Natural Gas Association Conference on OQ (Clearwater, FL)	Sep 16, 1999
Southwest Regional NAPSRS Meeting (Santa Fe, NM)	Sep 20-24, 1999
University of Texas - Presentation on OQ (Sheraton Astrodome, Houston)	Sep 22-24, 1999
NACE Conference on OQ (Kansas City, MO)	Sep 25-29, 1999
Oklahoma Gas Association Conference on OQ	Sep 27-29, 1999
Arizona Utility Group Conference (Mesa, AZ)	Oct 18-21, 1999
Southern Regional NAPSRS Meeting (Biloxi, MS)	Oct 18-21, 1999
<b>Final Rule (Published August 27, 1999)</b>	<b>Eff Date: Oct 26, 1999</b>
PEPG Meeting on OQ (TSI OKC)	Oct 26-28, 1999
OQ Presentation at DCA Board Meeting (Plano, TX)	Nov 18, 1999
Southern Gas Association OQ Roundtable Conference (Nashville, TN)	Nov 29–Dec 3, 1999
Columbia Gas Transmission Meeting on OQ	Jan 17-19, 2000
OQ Meeting (NACE / CRCUC / TSI) (Shorewood, IL)	Jan 18, 2000
PEPG Meeting on OQ (Las Vegas, NV)	Feb 21-22, 2000
ETN/MEA Training and Qualification Conference (Las Vegas, NV)	Feb 23-25, 2000
Louisiana Gas Association Meeting on OQ (Mayor's Office, Eunice, LA)	Mar 6-8, 2000
GPA 79 <sup>th</sup> Annual Convention/OQ (Atlanta, GA)	Mar 13-14, 2000
Alabama Natural Gas Association OQ Conference (Montgomery, AL)	Mar 13-15, 2000
EnergyWorX Net Talk on OQ (Southern Union)	May 2, 2000
Four Corners Oil & Gas Conference/OQ Roundtable (Farmington, NM)	May 8, 2000
Southern Gas Association's OQ Benchmarking Roundtable (Louisville, KY)	May 8-9, 2000
Texas Gas Association Meeting on OQ (Port Royal, TX)	Jun 12-14, 2000
78 <sup>th</sup> NARUC Conference on OQ & Covered Tasks (Ashland, NE)	Jun 25-27, 2000
NAPSRS 2000 Eastern Regional Meeting (Charleston, WV)	Jul 31–Aug 3, 2000

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MEA Annual Gas Operations Conference (Ames, IA)	Aug 1-4, 2000
PEPG Meeting on OQ (Bedford, NH)	Aug 16-18, 2000
Southern Gas Association Workshop on OQ (New Orleans, LA)	Sep 6-9, 2000
NAPSR Southern Region Meeting (Wilmington, NC)	Sep 11-15, 2000
Florida Gas Association Conference (Clearwater, FL)	Sep 13-15, 2000
NAPSR Western Region Meeting (Kalispell-Whitefish, MT)	Sep 18-21, 2000
OQ Presentation at DCA (Houston, TX)	Sep 21, 2000
2000 NACE Int'l Corrosion Conference (OQ Rule & Updates) (Lafayette, LA)	Oct 15, 2000
NAPSR Southwest Region Meeting (Tulsa, OK)	Oct 16-19, 2000
OQ Presentation for Tosco Distribution Co. (Santa Fe Springs, CA)	Oct 18-20, 2000
NAPSR Central Region Meeting (Clive, IA)	Oct 23-27, 2000
<b>OQ Training - Southern Region (Atlanta, GA)</b>	<b>Dec 12-14/ 2000</b>
<b>OQ Training - Central Region (Kansas City, MO)</b>	<b>Jan 30-31, 2001</b>
OQ Conference (Energy Worldnet, Inc.) (New Orleans, LA)	Feb 1, 2001
<b>OQ Training - Western Region (Lakewood, CO)</b>	<b>Feb 6-7, 2001</b>
2001 Pipeline OQ Conference (Houston, TX)	Feb 13, 2001
<b>OQ Training - Eastern Region (Washington, DC)</b>	<b>Feb 13-16, 2001</b>
<b>OQ Training - Southwest Region (Houston, TX)</b>	<b>Feb 27-28, 2001</b>
APGA OQ Audio Conference	Mar 15, 2001
PEPG Meeting on OQ (Las Vegas, NV)	Mar 19-20, 2001
ETN/MEA Conference on OQ (Las Vegas, NV)	Mar 19-23, 2001
OQ Meetings with OPS Southern Region (Atlanta, GA)	Apr 9-10, 2001
OQ Meetings with Georgia PSC (Atlanta, GA)	Apr 11-12, 2001
DOT OQ Roundtable: Gas Processors Assn., Mid-Continent Chapter Regional Meeting & OQ Roundtable (OKC, OK)	Apr 26, 2001
<b>Deadline to Complete &amp; Make Available for Regulatory Review Written Qualification Programs</b>	<b>Apr 27, 2001</b>
American Gas Association/Southern Gas Association OQ Workshop (Dallas, TX)	Apr 30-May 3, 2001
American Petroleum Institute OQ Conference (Washington, DC)	May 22-24, 2001
American Petroleum Institute OQ Conference II (Baton Rouge, LA)	May 29-31, 2001
NAPSR Western Region Meeting (Long Beach, CA)	Jun 4-8, 2001
Texas Gas Association Annual Meeting and OQ Discussion (San Antonio, TX)	Jun 6-8, 2001
NAPSR Southwest Region Meeting (Corpus Christi, TX)	Jul 9-12, 2001
NCRUCE Conference on OQ (West Yellowstone)	Jun 24, 2001
GTI Natural Gas/LPG Odorization Conf. & OQ Discussion (Chicago, IL)	Jul 22-25, 2001
NAPSR Eastern Region Meeting (Salem, MA)	Jul 30-Aug 3, 2001
MEA Annual Conference on OQ (Ames, IA)	Aug 6-10, 2001
NAPSR Southern Region Meeting	Aug 20-25, 2001
Western Regional Gas Conference on OQ (Tempe, AZ)	Aug 27-Sep 1, 2001
4 OQ Presentations at OU Compressor Short Course (VoTech School-Okmulgee, OK)	Sep 18-19, 2001
SGA OQ Telecon (Moderated by Rich Huhn, CMS Energy Panhandle - PEPG)	Oct 2, 2001
Texas Gas Assn. OQ Roundtable (San Antonio, TX)	Nov 8-9, 2001
Southern Gas Association/American Gas Association OQ Conference (Nashville, TN)	Dec 3-6, 2001
<b>Pipeline Safety Improvement Act</b>	<b>2002</b>
OQ Team Meeting	Jan 6-10, 2002
ETN/MEA OQ and Training Conference (Orlando, FL)	Mar 25-29, 2002
OQ Presentation at 77 <sup>th</sup> Int'l School of Hydrocarbon Measurement (Myriad OKC)	May 22, 2002

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Consortium on Operator Qualification (COOQ) Meeting on OQ (Atlanta, GA)	May 28, 2002
MEA Conference on OQ (Ames, IA)	Aug 6, 2002
OQ Telecon (Gerard / Wood / Sanders / Miller)	Aug 7, 2002
OQ Evaluations (Memphis Light, Gas & Water)	Aug 12-17, 2002
OQ Inspection: Puget Sound Energy (Seattle, WA)	Aug 19-20, 2002
OQ Inspection: Williams Energy Service (Tulsa, OK)	Aug 27-28, 2002
OQ Inspection: Jayhawk Pipeline (McPherson, KS)	Aug 28-29, 2002
OQ Inspection: KOCH (Wichita, KS)	Aug 29-30, 2002
PEPG/RG&E Meeting (OQ/IMP) (Rochester, NY)	Sep 3-7, 2002
OQ Inspection: RG&E (Rochester, NY)	Sep 6-7, 2002
OQ Team Fact-finding Visit: Reliant/Minnegasco	Sep 9-13, 2002
OQ Inspection: Colorado Springs Utility	Sep 16-17, 2002
Gas Workers Conference on OQ (Local 32 Plumbers & Pipefitters) (Las Vegas, NV)	Sep 16-19, 2002
OQ Inspections: EXCEL & Colorado Public Service (Colorado Springs & Denver)	Sep 20-21, 2002
NAPSR National Board of Directors Meeting (Presented OQ Paper) (St. Louis, MO)	Sep 23-27, 2002
OQ Fact-finding Visit: Mobile Gas (Mobile, AL)	Sep 27-Oct 2, 2002
OQ Fact-finding Visit: Exxon Offshore (Mobile, AL)	Oct 2-5, 2002
OQ Fact-finding Visit: TXU Lonestar / Kinder Morgan (Dallas & Houston, TX)	Oct 15-19, 2002
OQ Presentation at Louisiana Gas Association	Oct 16-17, 2002
<b>Operators must Complete Qualification Process for all Individuals Performing Covered Tasks on Pipeline Systems</b>	<b>Oct 28, 2002</b>
Letters from OQ Team requesting Scheduling of Fact-finding Visits	Nov 12, 2002
<b>Inspections Commence</b>	<b>Dec 2002</b>
OQ Stage 1 Enforcement Insp.: Sinclair Pipeline Products Terminal (Henderson, CO)	Dec 2-7, 2002
OQ Stage 1 Enforcement Insp.: KOCH Petroleum Group (Wichita, KS)	Dec 9-13, 2002
OQ Team Meeting: Protocols, FAQs, Legal Issues & Plan for Public Mtgs (TSI OKC)	Jan 6-10, 2003
Telecon on OQ (OQ Team and Stacey Gerard)	Jan 9, 2003
<b>1<sup>st</sup> OPS Public Meeting on OQ – San Antonio, TX</b>	<b>Jan 22, 2003</b>
OQ Logistic Telecon on Public Meetings, Q&As, Comments, Etc.	Feb 5, 2003
ADC/DOT OQ Meeting (New Orleans, LA)	Feb 7, 2003
OQ Team Meeting with TSI Tech Staff (Review OQ presentations for use in Training)	Feb 18-21, 2003
<b>2<sup>nd</sup> OPS Public Meeting on OQ – Houston, TX</b>	<b>Feb 25-27, 2003</b>
OQ Consortium Inspection: NCCER HQ (Gainesville FL)	Mar 3-7, 2003
OQ Telecon with Industry to Prepare for Phoenix Public Meeting & Discuss Prelim Work on Supplemental Guidance Materials	Mar 19, 2003
<b>3<sup>rd</sup> OPS Public Meeting on OQ – Mesa, AZ</b>	<b>Mar 24-26, 2003</b>
OQ Team Meeting (OPS CE Region - Kansas City, MO)	Apr 1-3, 2003
Telecon (OPS, OQ Team, Industry)	Apr 3, 2003
OQ Inspections: Duke & Shell Pipeline (Houston, TX)	Apr 7-11, 2003
OQ Inspections: El Paso and Exxon Mobile (Houston, TX)	Apr 14-18, 2003
<b>4<sup>th</sup> OPS Public Meeting on OQ (Atlanta, GA)</b>	<b>Apr 21-23, 2003</b>
<b>Field Verifications Begin</b>	<b>May 2003</b>
OQ Inspection: British Petroleum (Lisle, IL)	May 5-8, 2003
Texas Lonestar (TXU) OQ Speaking Engagement (Myriad OKC)	May 20, 2003
COOQ Meeting on OQ at DePaul University, Naperville, IL	May 27-28, 2003
OQ Inspection: Midwest Energy Association, Minneapolis, MN	May 29-30, 2003
<b>Supplementary Guidance Completed</b>	<b>Jun 2003</b>



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OO Team Reset Meeting on CBT, FAQs and Supplemental Guidance (TSI OKC)	Jun 2-5, 2003
OO Inspections: Alyeska, Unocal, Enstar	Jun 8-22, 2003
OO Team Telecon on Protocols	Jun 23, 2003
B31Q Telecon	Jun 25, 2003
OO Inspections: ExxonMobil and Collins (Kenner and Collins, LA)	Jul 7-18, 2003
OO Team Reset Meeting (Santa Fe, NM)	Jul 21-25, 2003
<b>Protocols Finalized</b>	<b>Jul 22, 2003</b>
OO Inspections: GTI/Keyspan (Sturbridge, MA)	Aug 4-8, 2003
B31Q Meeting (Denver, CO)	Aug 11-15, 2003
OO Team Meeting on CBT (TSI OKC)	Aug 19-21, 2003
<b>OO CBT Presented at NAPS Board Meeting</b>	<b>Sep 8, 2003</b>
B31Q Meeting (Las Vegas, NV)	Sep 22-26, 2003
<b>OO CBT (Planned date was August 2003)</b>	<b>Oct 8, 2003 (shipped)</b>
B31Q Audio Conference (John Harper, Moderator)	Oct 16-17, 2003
B31Q Meeting (Houston, TX)	Oct 27-31, 2003
B31Q Meeting (Tampa, FL)	Dec 1-5, 2003
OO Inspection: Enbridge & Browning Ferris (Houston, TX)	Dec 1-5, 2003
OO Inspection: Tesoro and Valero (San Antonio, TX)	Dec 8-12, 2003
OO Inspection: Alliance & NSP (Minnesota)	Dec 15-19, 2003
<b>OO Inspections Handed off to Regions</b>	<b>Jan 2004</b>
OO Inspections: Athens & Pelham, AL	Jan 5-9, 2004
B31Q Meeting (Houston, TX)	Jan 12-14, 2004
B31Q Telecon (Update Industry on Progress of Committee)	Jan 22, 2004
<b>OO Team Final Meeting (Clearwater, FL)</b>	<b>Feb 9-13, 2004</b>
<b>Developed OO Lessons Learned</b>	<b>Feb 13, 2004</b>
B31Q Meeting (San Antonio, TX)	Feb 29-Mar 4, 2004
OO Inspections: Jayhawk/NCRA (Kansas)	Mar 1-2, 2004
OO Inspections: Murphy/Transmontaigne (Arkansas)	Mar 15-16, 2004
<b>OO Telecons (OPS HQ / TSI / States / Liaisons) All NAPS Conf Calls with OPS on OO</b>	<b>Mar 16 - 17, 2004</b>
OO Inspections: Eunice Municipal Assn / MS LDC / OOSQ (Eunice & Denham Springs, LA)	Mar 18-19, 2004
B31Q Team 6 Telecon	Mar 22, 2004
OO Inspection: Clark Refining/Crossroads, Indiana	Mar 29, 2004
OO Inspection: Amerigas/Buckeye, Pennsylvania	Jun 14, 2004
OO Inspection: Countrymark/Field, Indiana	Jun 21, 2004
OO Inspection: St. Louis Pipeline, New York	Jul 5, 2004
OO Inspection: Dome/Field (Minnesota or Canada)	Jul 19, 2004
<b>Consensus Standard (Target Date was May 1, 2004) (Long Term planned date for final is June 2004)</b>	<b>TBD</b>

The following documentation is presented chronologically to provide more detailed definition to the timeline outlined above.