



# Emergency Operations Plan (EOP) Requirements and Filing

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# Agenda



## Topics that will be covered today:

- Statutory authority
- Applicability to operators
- Filing deadline
- How/What to file
- EOP review letters
- Q&A

# Statutory Authority (1 of 4)



- Texas Utilities Code  
§186.008, *Railroad  
Commission Weather  
Emergency Preparedness  
Reports*



# Statutory Authority (2 of 4)



- RRC staff report includes data from
  - Reviewing current EOPs
  - Analyzing the ability of electric supply chain to withstand weather emergency events
  - Consideration of weather patterns

# Statutory Authority (3 of 4)

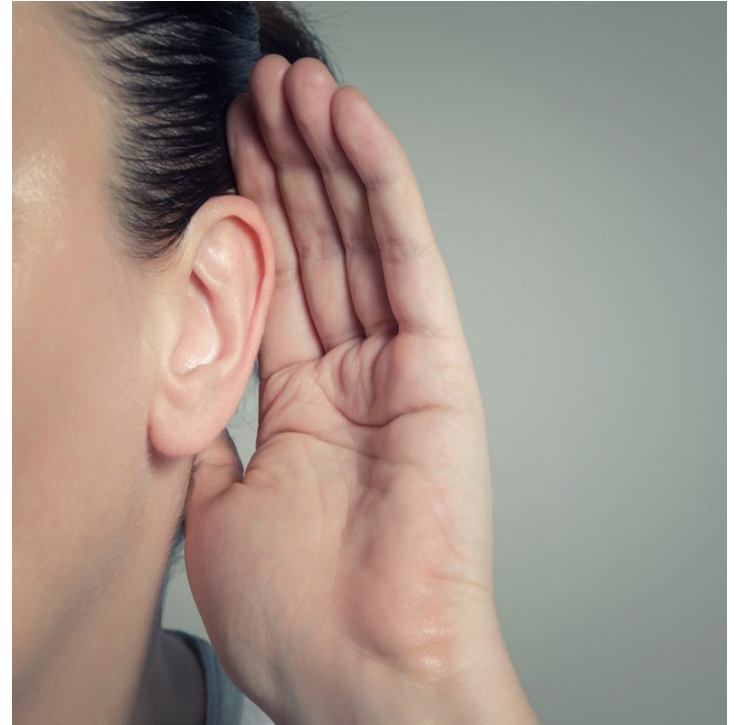


- When reviewing EOPs:
  - CIX/Special Project Engineers can make recommendations to improve EOPs
  - RRC does require operators to file updated EOP if it does not contain adequate information

# Statutory Authority (4 of 4)



- EOPs are public information
- If portions of the EOP are confidential, the plan can be submitted in redacted form for public inspection



# Applicability to Operators



- Section 186.008 (a) states the RRC shall analyze EOPs of operators that:
  - (1) produce, treat, process, pressurize, store or transport natural gas; **AND**
  - (2) are included in the electricity supply chain map adopted by the Texas Energy and Electricity Supply Chain Mapping Committee originally adopted in April 2022

# Filing Deadline



- EOPs are due by August 1, 2024
- Operators on supply chain map that are needing to file should have received letter from CID mid May 2024
- EOPs will file through the CID Portal Dashboard on the RRC Online System

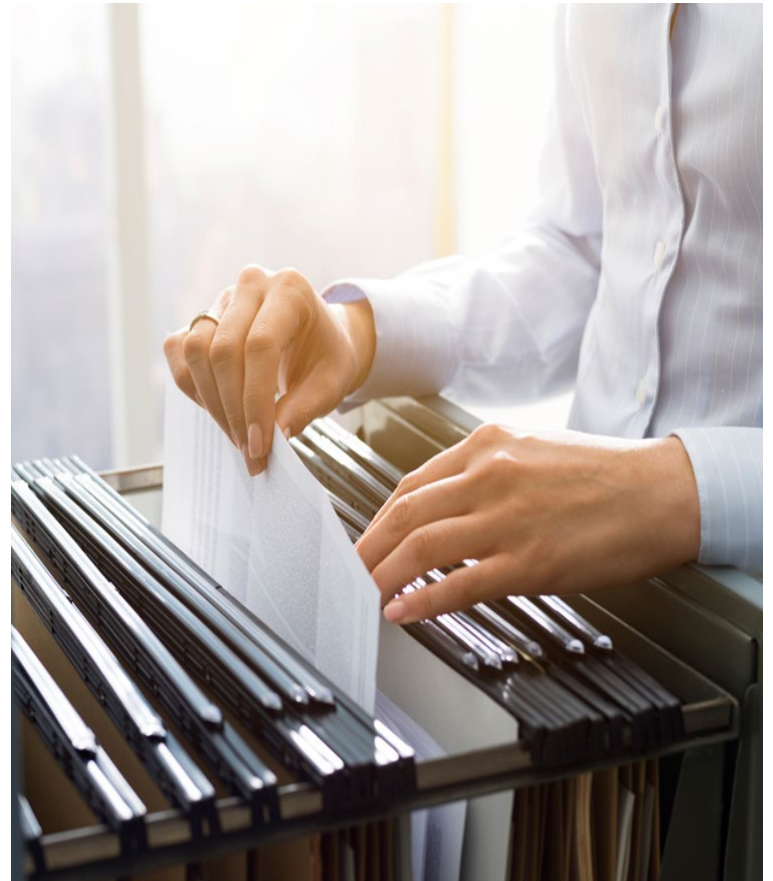




# Filing Details ( 1 of 3)




- Each operator is required to file 1 **unredacted** EOP. An operator may also submit 1 redacted EOP
- The filings portal for EOPs is now open and will remain open for any operators to gain compliance



# Filing Details (2 of 3)





## Railroad Commission of Texas

**Menu**

- Home
- RRC Online
- Dashboard
  - Dashboard
  - EOP Dashboard**
  - EOP Dashboard
  - Upload EOP Data
- Submit Forms
  - Submit Form CID
  - Submit Form CIX
- Submit All Forms
- Mark CID Forms Submitted
- Mark CIX Forms Submitted
- Multi Delete
- Delete Multiple Applications
- Help
  - User Guide

### Critical Infrastructure Designation

No Unredacted EOP documents on file : The operator 630555 does not have the required Unredacted EOP documents uploaded. Please use the 'Upload EOP Data' on the

Dashboard

(Displaying 1 - 20 of 254)

	Application Id	Facility Name	Well Type	Upload Type	Application Status	Fi
Actions	325975	WILLARD UNIT 001WD	Saltwater Disposal Wells	CID	Payment Not Required	
Actions	325974	WEST SEMINOLE SA UNIT 3WD	Saltwater Disposal Wells	CID	Payment Not Required	
Actions	325973	WEST SEMINOLE SA UNIT 2WD	Saltwater Disposal Wells	CID	Payment Not Required	
Actions	325972	WEST MERCHANT 1401WD	Saltwater Disposal Wells	CID	Payment Not Required	
Actions	325971	UNIVERSITY 53 15	Saltwater Disposal Wells	CID	Payment Not Required	
Actions	325970	UNIVERSITY 30 1HH	Saltwater Disposal Wells	CID	Payment Not Required	
Actions	325969	SHARON RIDGE CANYON UNIT 4011W	Saltwater Disposal Wells	CID	Payment Not Required	
Actions	325968	OSPREY '9' 902	Saltwater Disposal Wells	CID	Payment Not Required	
Actions	325967	"OSPREY "9" 903"	Saltwater Disposal Wells	CID	Payment Not Required	
Actions	325966	"OSPREY "9" 9"	Saltwater Disposal Wells	CID	Payment Not Required	
Actions	325965	NORMAN 6D	Saltwater Disposal Wells	CID	Payment Not Required	
Actions	325964	NORMAN 4 SWD	Saltwater Disposal Wells	CID	Payment Not Required	
Actions	325963	MERCHANT 1601WD	Saltwater Disposal Wells	CID	Payment Not Required	
Actions	325962	MARIINSKY STATE 8 2W	Saltwater Disposal Wells	CID	Payment Not Required	
Actions	325961	MARIINSKY STATE 8 19	Saltwater Disposal Wells	CID	Payment Not Required	
Actions	325960	MARIINSKY STATE 8 18	Saltwater Disposal Wells	CID	Payment Not Required	
Actions	325959	MARIINSKY STATE 8 17	Saltwater Disposal Wells	CID	Payment Not Required	
Actions	325958	Jones Odonnell 1WD	Saltwater Disposal Wells	CID	Payment Not Required	
Actions	325957	DORA ROBERTS RANCH 2901 D-2-1 SWD	Saltwater Disposal Wells	CID	Payment Not Required	

# Filing Details (3 of 3)



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## Upload Attachments

Select EOP Filing Type

- Select EOP Filing Type
- Redacted (Optional)
- Unredacted

on below to complete your document upload(s)!!

Select file for EOP Information upload. Operators are required to file at least one unredacted file for their EOP filings.

Operators may file a redacted filing for use with Open Records Requests if confidential information is contained in the documents.

+ Choose EOP Upload PDF File

## Attachment List

Attachment Name	Attachment Size	Attachment Type	Submission Date	Submitter
No Attachments found.				

Submit

Cancel

# EOP Contents (1 of 2)



- Only one EOP per P5
- Consolidate all your facilities to one EOP
- EOP should include sections about all the following:
  - Introduction
  - Communication, both internal and external
  - Preparedness



# EOP Contents (2 of 2)



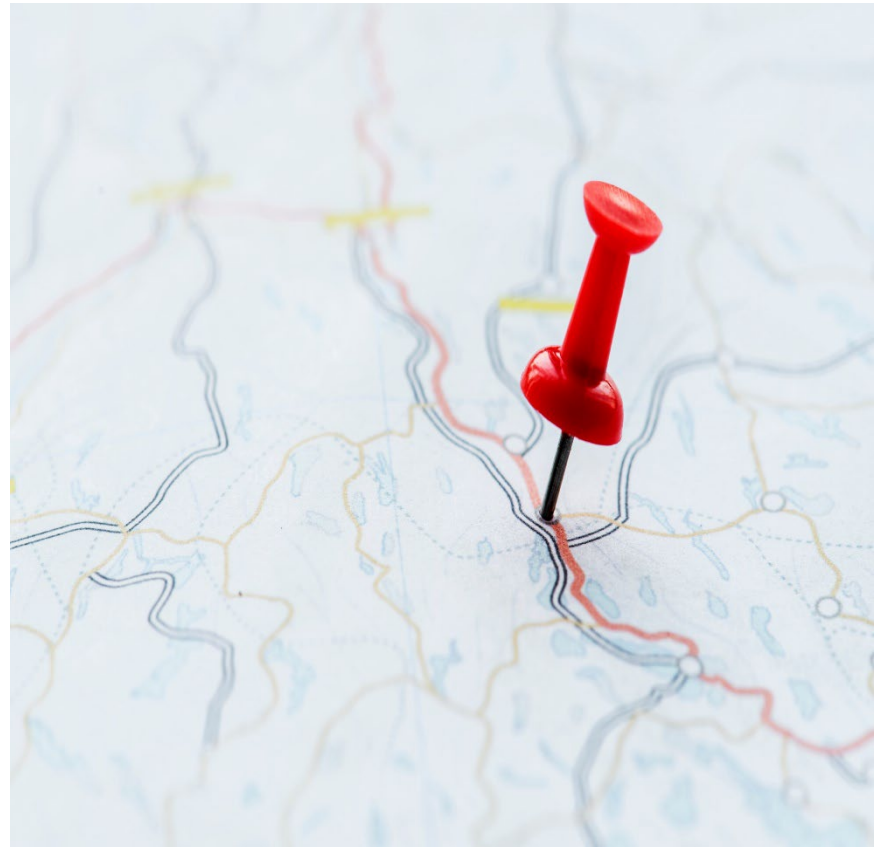
- Testing
- Staffing
- Tabletop Exercises/Drills
- Weather Related Hazards
- EOP Activation
- Restoration of Service
- Emergency Contacts



# Introduction Section(1 of 2)



- Table of Contents
- Legal name of company and P-5 number
- System(s) Overview including general location and facility types
- Staff training on the contents of the EOP



# Introduction Section(2 of 2)



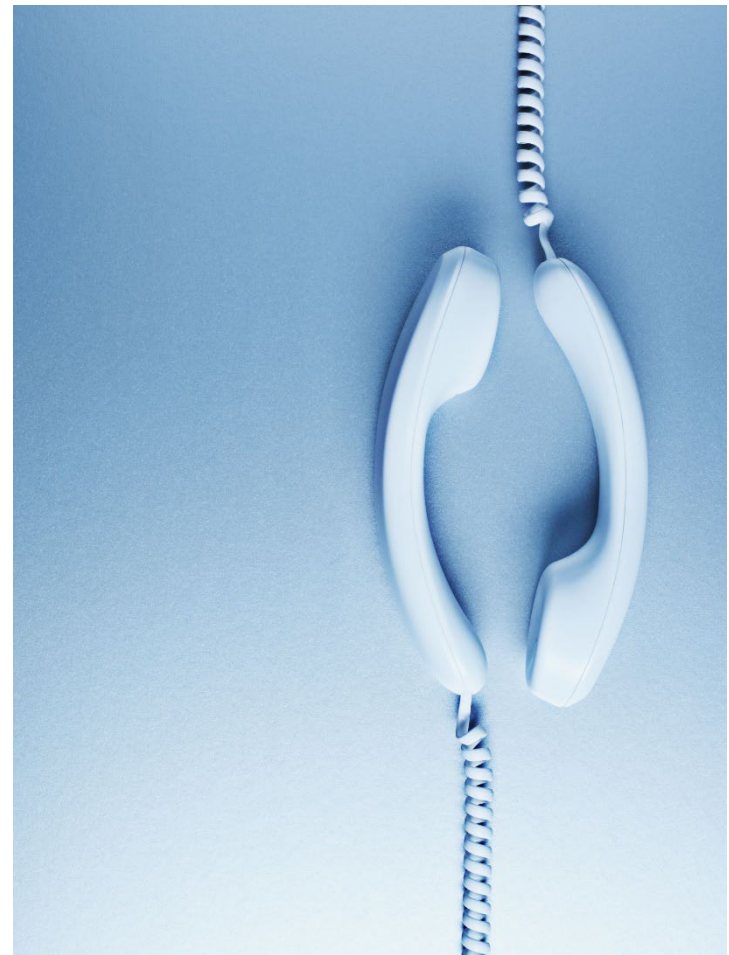
- Individual(s) responsible or maintaining and implementing the EOP
- Individual(s) authorized to activate the EOP or sections of the EOP
- Individual(s) authorized to revise the EOP
- Effective date of EOP
- Record of Distribution



# Internal Communication



- Procedures for communicating within the company during an emergency
  - Primary and secondary
  - Key employees





# External Communication



- Procedures during an emergency for communication with:
  - Critical customers
  - State and local emergency operations centers (EOCs)
  - Local and state governmental entities and officials
  - RRC
  - Media



# Preparedness



- Address the following intended for emergency response:
  - Pre-identified supplies
  - Parts
  - Equipment



# Staffing



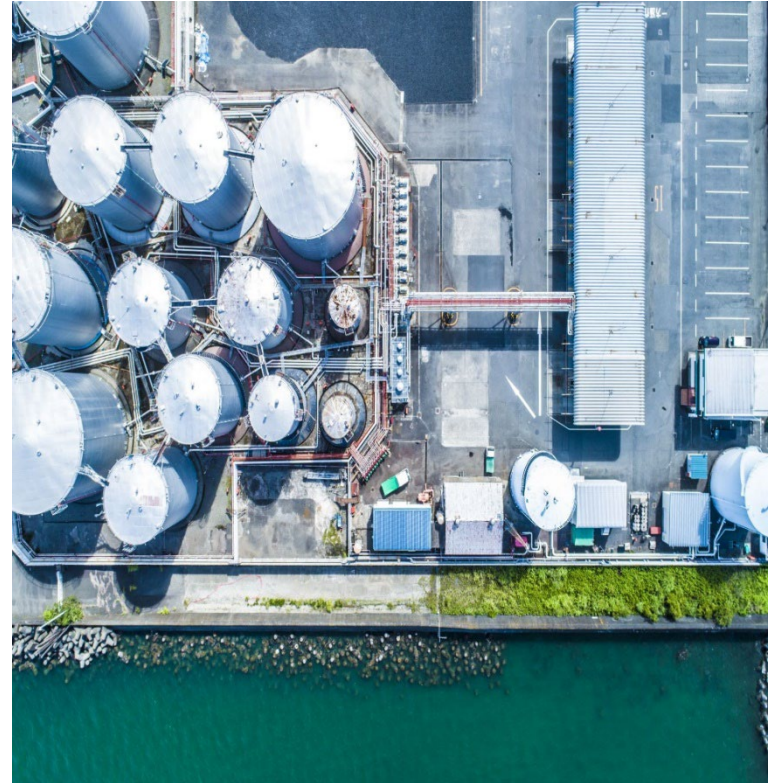
- Detailed plan that addresses staffing during emergency response.



# Testing



- Documentation to function-test existing equipment ahead of emergencies
  - Including back-up generators
  - Known critical failure components



# Hazard Responses



- Plans that addresses how you identify weather- related hazards as applicable to your geographic area, including:
  - Tornadoes
  - Hurricanes
  - Rolling blackouts
  - Flooding



# Exercises/Drills



- Frequency tabletop or simulated event exercises
- Issues identified and corrective actions taken



# EOP Activation



- EOP Response section should include the process the company follows to activate the EOP; and
- The response actions during an emergency once the EOP is activated such as personnel, transportation, communications procedures and the location, use, and maintenance of emergency supplies and equipment

# Emergency Contacts



- Should include an Emergency Contact Annex that lists primary and backup emergency contacts for critical facilities
- Should also have a general list of emergent numbers such as local Police Dept, Fire Dept, EOC, RRC District Office, etc.





# Restoration



- Detailed plan on Restoration of Service discussing procedures for return to service following disrupted operations

# EOP Reviews



- EOPs will be reviewed by RRC staff through the RRC online dashboard
  - **Approved**  Administratively Complete
  - **Incomplete**  Returned
- You may receive a letter stating possible improvements for your EOP, and you are not required to respond to this letter with updates

# CID Staff Info



- Rob Castillo – CIX and Special Projects manager  
512-305-8834 or [Rob.Castillo@rrc.Texas.gov](mailto:Rob.Castillo@rrc.Texas.gov)
- Holt James – Administrative Support team  
512-463-6827 or [Holt.James@rrc.Texas.gov](mailto:Holt.James@rrc.Texas.gov)
- Nicolas Stasulli – Compliance CID team  
512-463-6957 or [Nicolas.Stasulli@rrc.Texas.gov](mailto:Nicolas.Stasulli@rrc.Texas.gov)
- Gilbert Herrera – Field Ops CID Director  
512-463-7285 or [Gilbert.Herrera@rrc.Texas.gov](mailto:Gilbert.Herrera@rrc.Texas.gov)
- Mysti Doshier – Assistant Director of CID  
512-463-6999 or [Mysti.Doshier@rrc.Texas.gov](mailto:Mysti.Doshier@rrc.Texas.gov)

# Q&A



- Please put your questions in the chat