

PHMSA UNDERGROUND NATURAL GAS STORAGE (UNGS)

KS-CC PROGRAM EVALUATION – CY2018

CONDUCTED 6/24-28/2019

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TOTAL PROGRAM EVALUATION POINTS	113

PHMSA UNGS STATE PROGRAM EVALUATION – CY2018

A – PROGRESS REPORT AND PROGRAM DOCUMENTATION REVIEW THIS SECTION ANALYZES ACCURACY AND COMPLETENESS OF ANNUAL PROGRESS REPORT		SCORE
1	<p>Accuracy of Jurisdictional Authority and Operator/Inspection Units Data – Progress Report Attachment 1 (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p>Comments: Yes, is consistent with existing KS law, and in agreement with attachment 3 & 8. Kansas Corporation Commission Oil and Gas Conservation Division (KS-CC) has authority to regulate underground porosity storage, see KS law KSA 55-1115. KS law disallows hydrocarbon storage in a fresh water aquifer; see KS law KSA 55-1115. [Note: a separate agency, KS Dept. of Health and Environment (DHE), has jurisdiction over salt caverns; current cavern storage is 100% liquid; is crude, or LPG. DHE will have jurisdiction if there is any gas cavern storage developed. Allie Lane, Geologist with DHE, is the Underground Hydrocarbon Storage (UHS) Program Manager. Alexandria.lane@ks.gov, Office: 785-296-7254, Cell: 785-230-0741.]</p>	1
2	<p>Review of Inspection Days for accuracy – Progress Report Attachment 2 (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p>Comments: NI, 0.5 of 1 point. Attachment 2 needed correction and was revised to agree with internal records. The count total is 9 days AFO.</p>	1
3	<p>Accuracy verification of Operators and Operators Inspection Units in State – Progress Report Attachment 3 (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p>Comments: Yes. The report agrees with internal records and PHMSA records of Annual Reports.</p>	1
4	<p>Accuracy verification of Compliance Activities – Progress Report Attachment 5 (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p>Comments: Yes. The report agrees with internal records.</p>	1
5	<p>Were UNGS program files well-organized and accessible? - Progress Report Attachment 6 (Yes= 2 points, No= 0 Points, NI=1 point)</p> <p>Comments: Yes. Records are currently a combination of paper and electronic files, and much of the paper records are in District office #2. Reviewed some of the electronic files, okay. KS-CC is in the process of going all electronic.</p>	2
6	<p>Was employee listing and completed training accurate and complete? – Progress Report Attachment 7 (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p>Comments: NI. 0.5 of 1 point. Attachment 7 needed correction and was revised to agree with internal records. Discussed a 2nd or 3rd inspector for Continuity of operations. All of the person-year time was reported as Supervision when the time needed to be split between Supervision, inspection, and other categories.</p>	1
7	<p>Verification of Part 192 and 199 Rules and Amendments – Progress Report Attachment 8 (Yes= 1 point, No= 0 Points)</p> <p>Comments: Yes. The attachment is consistent with current KS laws. Discussed getting all items adopted and acknowledged the limits to KS-CC regulatory authority. KS-CC has authority to regulate underground porosity storage, see KS law KSA 55-1115. KS law disallows hydrocarbon storage in a fresh water aquifer; see KS law KSA 55-1115. [Note: a separate agency, KS Dept. of Health and Environment (DHE), has jurisdiction over salt caverns; current cavern storage is 100% liquid; is crude, or LPG. DHE will have jurisdiction if there is any gas cavern storage developed. Allie Lane, Geologist with DHE, is the Underground Hydrocarbon Storage (UHS) Program Manager. Alexandria.lane@ks.gov, Office: 785-296-7254, Cell: 785-230-0741.]</p>	1

8	<p>List of Planned Performance - Did State describe accomplishments on Progress Report in detail – Progress Report Attachment 10 (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p>Comments: Yes. The report shows their accomplishments and goals.</p>	1
9	<p>General Comments: 2 questions are NI for cumulative loss of 1 point. Score is 8 of 9 points.</p> <p>Dwight D. Keen, Chairman Kansas Corporation Commission 1500 SW Arrowhead Rd Topeka, KS 66604-4027</p> <p>Ryan Hoffman, Director Kansas Corporation Commission Oil and Gas Conservation Division 266 N. Main, Suite 220 Wichita, KS 67202-1513 Fax: 316-337-6211</p> <p>KS UNGS Program has 1 part time inspector. Was expected to be a 10% FTE duty but it now appears more; perhaps up to 75% FTE duty. KS program size is 3 operators, 6 fields, (2 appear to be sub-economic and 4 are very shallow at 190', 250', 471 and 440' to top of reservoir, MAOP are 90, 95, 205, & 225 psi). The Oneok fields are more traditional; Konold, 5 wells, 1.1 BCF, 2886', 1100 psi MAOP, and Brehm 17 wells, 4300', 1260 psi maop, 3.8 BCF.</p> <p>Significant incidents? – There were no UNGS significant incidents reported in 2018.</p>	9

<p align="center">B – PROGRAM INSPECTION PROCEDURES</p> <p align="center">Does State Inspection Plan include procedures that address the following elements? (See Guidelines Section 5.1)</p>		
1	<p>Does State have written inspection procedures? (Yes= 2 points, No= 0 Points, NI=1 point)</p> <p>Comments: NI. 1 of 2 points. Several procedures exist but they have not been incorporated into a UNGS Procedures Manual. D&A & Damage Prevention are examples of items not yet addressed.</p>	2
2	<p>Standard Inspections</p> <p>Do Standard Inspection procedures give guidance to State inspectors that insure consistency for inspections conducted by the State? The following elements should be addressed at a minimum.</p> <ul style="list-style-type: none"> • Pre-Inspection Activities • Inspection Activities • Post Inspection Activities <p>(Yes= 2 points, No= 0 Points, NI=1 point)</p> <p>Comments: NI 1 of 2 points. The procedure that currently exists does not address pre and post activities.</p>	2
3	<p>Specialized Inspections</p> <p>Do Specialized Inspection procedures give guidance to State inspectors that insure consistency for inspections conducted by the State? The following elements should be addressed at a minimum.</p> <ul style="list-style-type: none"> • Pre-Inspection Activities • Inspection Activities • Post Inspection Activities <p>(Yes= 2 points, No= 0 Points, NI=1 point)</p> <p>Comments: NI 1 of 2 points. The procedure that currently exists does not address pre and post activities.</p>	2
4	<p>Design, Testing, and Construction Inspections</p> <p>Do Design, Testing, and Construction Inspection procedures give guidance to State inspectors that insure consistency for Inspections conducted by the State? The following elements should be addressed at a minimum.</p> <ul style="list-style-type: none"> • Pre-Inspection Activities • Inspection Activities • Post Inspection Activities <p>(Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p>Comments: NI 0.5 of 1 point. The procedure that currently exists does not address pre and post activities.</p>	1

5	<p>Drug and Alcohol Inspections</p> <p>Do Drug and Alcohol Inspection procedures give guidance to State inspectors that insure consistency for Inspections conducted by the State? The following elements should be addressed at a minimum.</p> <ul style="list-style-type: none"> • Pre-Inspection Activities • Inspection Activities • Post Inspection Activities <p>(Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p>Comments: NO. 0 of 1 point. D&A has not been addressed within KS-CC. We discussed that it is required.</p>	1
6	<p>Does inspection plan address inspection priorities of each inspection unit, based on the following elements?</p> <ul style="list-style-type: none"> • Length of time since last inspection (Within five-year interval per inspection unit) • Operating history of operator/unit and/or location (includes leakage, incident and compliance activities) • Type of activity being undertaken by operators in inspection units (i.e. construction) • Locations of operator's inspection units being inspected - (HCA's, Geographic area, Population Density, etc.) • Process to identify high-risk inspection units considering integrity threats • Are inspection units broken down appropriately? <p>(Yes= 6 points, No= 0 Points, NI=1-5 points)</p> <p>Comments: NI 5 of 6 points. There is no formal document that analyzes inspection priorities. 5 of the items are addressed informally.</p>	6
7	<p>General Comments: All 6 questions are NI or NO for loss of 5.5 points. Score is 8.5 of 14.</p>	14

C – PROGRAM PERFORMANCE		
1	<p>Was ratio of Total Inspection Person-Days to Total Person-Days acceptable? (Chapter 4.2)</p> <p>A = Total Inspection Person Days (Attachment 2) B = Total Inspection Person Days Charged to the program (220 x Number of Inspection person years from Attachment 7) Ratio = A/B If Ratio >= .38 then score = 5 points. If Ratio < .38 then score = 0 points. (Yes= 5 points, No= 0 Points) Comments: YES. A=9days. B=13 days. 9/13=.69. >.38 okay.</p>	5
2	<p>Has each Inspector and Program Manager fulfilled the TQ Training Requirements? (See Guidelines Appendix C for requirements and Chapter 4.3.1)</p> <p>(Yes= 5 points, No= 0 Points, NI=1-4)</p> <p>Comments: Yes. Program is in its first three years of our partnership and the lead inspector has received his TQ training. Discussed the need to get back-up inspectors trained.</p>	5
3	<p>Does State use the PHMSA Inspection Assistant (IA) program to document inspections?</p> <p>(Yes= 2 points, No= 0 Points, NI=1 point)</p> <p>Comments: NO. 0 of 2 point. Training on IA is on the KS-CC 'to do' list.</p>	2
4	<p>Did records and discussions with Program Manager indicate adequate knowledge of PHMSA program and regulations? Chapter 4.1,8.1</p> <p>(Yes= 2 points, No= 0 Points, NI=1 point)</p> <p>Comments: NI 1 of 2 points. This is the first year of the partnership. They are responsibly learning about the program.</p>	2
5	<p>Did State respond to PHMSA's Evaluation Letter within 60 days and correct or address any noted deficiencies? Chapter 8.1</p> <p>(Yes= 2 points, No= 0 Points, NI=1 point)</p> <p>Comments: NA. This is the first year of the partnership, there was no letter.</p>	2
6	<p>Did State inspect all types of operators and inspection units in accordance with time intervals established in their written procedures? Chapter 5.1</p> <p>(Yes= 5 points, No= 0 Points, NI=1-4 points)</p> <p>Comments: NA. The procedures that exist have not been formalized to the UNGS program, but every operator was visited.</p>	5
7	<p>Did State Inspection form(s) cover all applicable code requirements addressed on Federal Inspection form(s)? Chapter 5.1</p> <p>(Yes= 2 points, No= 0 Points, NI=1 point)</p> <p>Comments: NA. The Federal Inspection Form has not yet been used nor a full UNGS inspection performed. Program partnership was in its first year in 2018. Training in IA has been discussed.</p>	2
8	<p>Did State complete all applicable portions of inspection forms?</p> <p>(Yes= 2 points, No= 0 Points, NI=1 point)</p> <p>Comments: Yes, State forms were used under State authority in 2018 for special inspections and were properly filled out.</p>	2
9	<p>Has the State reviewed Operator Annual reports, along with Incident/Accident reports, for accuracy and analyzed data for trends and operator issues?</p> <p>(Yes= 2 points, No= 0 Points, NI=1 point)</p> <p>Comments: NI 1 of 2 points. KS-CC was unaware of Federal annual reports, but they are now and have downloaded them and are reviewing them. Directions were provided on how to access PHMSA Portal and use Pipeline Data Mart.</p>	2

10	<p>Is the State verifying operators are conducting drug and alcohol tests required by regulations? This should include verifying positive tests are responded to in accordance with program. 49 CFR 199</p> <p>(Yes= 2 points, No= 0 Points, NI= 1 point)</p> <p>Comments: No. 0 of 2 points. This was discussed and coordination with KCC PS needs to be arranged.</p>	2
11	<p>Does the State have a mechanism for communicating with stakeholders regarding the inspection and enforcement program? (This should include making enforcement cases available to public).</p> <p>(Yes= 1 points, No= 0 Points, NI=.5 point)</p> <p>Comments: Yes. KS-CC has a mature process for dealing with probable violations and items of concern.</p>	1
12	<p>Did State execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.3</p> <p>(Yes= 1 points, No= 0 Points, NI=.5 point)</p> <p>Comments: NA. No SRC have been reported. Discussed 191.7 & 191.23.</p>	1
13	<p>Did the State participate in/respond to surveys or information requests from PHMSA?</p> <p>(Yes= 1 points, No= 0 Points, NI=.5 point)</p> <p>Comments: Yes. KS-CC has responded to all PHMSA requests.</p>	1
14	<p>Did the State forward any potential waivers/special permits to PHMSA for review prior to issuing them to operators?</p> <p>(Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p>Comments: NA. There have been none.</p>	1
15	<p>If the State has issued any waivers/special permits for any operator, has the State verified conditions of those waivers/special permits are being met? This should include having the operator amend procedures where appropriate.</p> <p>(Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p>Comments: NA. There have been none.</p>	1
16	<p>General Comments: 4 questions were No or NI. Loss of 6 points. 6 questions were NA, Score is 16 of 22. KS-CC needs to learn about IA. KS-CC needs to compare IA UNGS questions and regs against their own KS-CC regs & choose the more stringent.</p>	34

D – COMPLIANCE ACTIVITIES		
1	<p>Does the State have written procedures to identify steps to be taken from the discovery to resolution of a probable violation? Chapter 5.1</p> <ul style="list-style-type: none"> • Procedures to notify an operator (company officer) when a noncompliance is identified • Procedures to routinely review progress of compliance actions to prevent delays or breakdowns • Procedures regarding closing outstanding probable violations <p>(Yes= 4 points, No= 0 Points, NI=1-3 points) Comments: NI 3 of 4 points. The existing policy is informal. Discussed the requirement to incorporate these steps into the UNGS Procedures.</p>	4
2	<p>Did the State follow compliance procedures (from discovery to resolution) and adequately document all probable violations, including what resolution or further course of action is needed to gain compliance? Chapter 5.1</p> <ul style="list-style-type: none"> • Were compliance actions sent to company officer or manager/board member if municipal/government system? • Document probable violations • Resolve probable violations • Routinely review progress of probable violations • ; and <p>(Yes= 4 points, No= 0 Points, NI=1-3 points) Comments: NA. There have been no probable violations of federal regulations found. The compliance procedures are being formalized.</p>	4
3	<p>Did State within 30 days of the end of an inspection conduct a post-inspection briefing with the owner or operator of the UNGS facility inspected outlining any concerns identified during the inspection?</p> <p>(Yes= 2 points, No= 0 Points, NI=1 point) Comments: NA. A Federal UNGS inspection was not performed in 2018. Applicable well site inspections were performed but no violations were found and the operator was so informed.</p>	2
4	<p>Did State within 90 days, to the extent practicable, provide the owner or operator with written preliminary findings of the inspection?</p> <p>(Yes= 2 points, No= 0 Points, NI=1 point) Comments: NA. No violations of Federal Regulations were found in 2018.</p>	2
5	<p>Did the State issue compliance actions for all probable violations discovered?</p> <p>(Yes= 2 points, No= 0 Points, NI=1 point) Comments: NA. No violations of Federal Regulations were found in 2018.</p>	2
6	<p>Did compliance actions give reasonable due process to all parties? Including "show cause" hearing if necessary.</p> <p>(Yes= 2 points, No= 0 Points) Comments: NA. No violations of Federal Regulations were found in 2018.</p>	2

7	<p>Is the Program Manager familiar with State process for imposing civil penalties? (describe any actions taken) (Yes= 2 points, No= 0 Points, NI=1 point)</p> <p>Comments: Yes. KS-CC has issued fines in the past. They are prepared to refer violations of federal regulations to PHMSA Eastern Region.</p>	2
8	<p>Were civil penalties considered for repeat violations, violations which can't be corrected by other means, or violations resulting in incidents? (Yes= 2 points, No= 0 Points, NI=1 point)</p> <p>Comments: NA. KS-CC will address this topic in their UNGS Procedures. They are prepared to refer violations of federal regulations to PHMSA Eastern Region.</p>	2
9	<p>Can the State demonstrate it is using their enforcement fining authority for safety violations? (Yes= 1 point, No= 0 Points, NI= .5 point)</p> <p>Comments: Yes. They are prepared to refer violations of federal regulations to PHMSA Eastern Region. A recent violation of State Regulations was issued to an operator for \$200 for failure to submit well plugging reports.</p>	1
10	<p>General Comments: 1 question was NI. Loss of 1 point. 6 questions were NA. Score is 6 of 7.</p>	21

E – INCIDENT INVESTIGATIONS		
1	<p>Does the State have written procedures to address State actions in the event of an incident? (Yes= 2 points, No= 0 Points, NI=1 point)</p> <p>Comments: NI, 1 of 2 points. Procedures exist but they need to be reviewed and brought into the UNGS Procedures.</p>	2
2	<p>Does State have adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports? (Yes= 2 points, No= 0 Points, NI=1 point)</p> <p>Comments: NI. 1 of 2 points. KS-CC receives and responds, 'by employee', during business hours. KS-CC receives, 'by answering machine', outside of business hours and responds, 'by employee', at the start of the next business day. It is policy that KS-CC is not an emergency responder and therefore does not have an emergency response plan for incidents. We discussed that PHMSA and their Partners are under a mandate to respond immediately. The logic is to maximize information gathering and to help secure evidence.</p>	2
3	<p>Did the State keep adequate records of Incident notifications received? (Yes= 2 points, No= 0 Points, NI=1 point)</p> <p>Comments: Yes. While there were no incidents in 2018, The policy for incident response exists. An incident from 2005 was reviewed.</p>	2
4	<p>If onsite investigation was not made, did State obtain sufficient information from the operator and/or by other means to determine the facts to support the decision to not go on-site? Chapter 6 (Yes= 1 point, No= 0 Points, NI= .5 point)</p> <p>Comments: Yes. While there were no incidents in 2018, The policy for incident response exists.</p>	1
5	<p>Were all incidents investigated, thoroughly documented, and with conclusions and recommendations?</p> <ul style="list-style-type: none"> • Observations and document review • Contributing Factors • Recommendations to prevent recurrences where appropriate <p>(Yes= 3 points, No= 0 Points, NI=1-2 points)</p> <p>Comments: Yes. While there were no incidents in 2018, The policy for incident response exists.</p>	3
6	<p>Did the State initiate compliance action for violations found during any incident investigation? (Yes= 1 point, No= 0 Points)</p> <p>Comments: Yes. While there were no incidents in 2018, The policy for incident response exists.</p>	1
7	<p>Did the State assist the Region Office or Accident Investigation Division (AID) by taking appropriate follow-up actions related to the operator incident reports to ensure accuracy and final report has been received by PHMSA? (validate report data from operators concerning incidents and investigate discrepancies) Chapter 6 (Yes= 1 point, No= 0 Points, NI= .5 point)</p> <p>Comments: NA. No requests were made in 2018.</p>	1
8	<p>Does State share lessons learned from incidents with PHMSA? (Yes= 1 point, No= 0 Points)</p> <p>Comments: NA. There were no incidents in 2018.</p>	1

9	General Comments: 2 questions were NI. Loss of 2 points. 2 questions were NA. Score is 9 of 11.	13
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F – DAMAGE PREVENTION		
1	<p>Did the State inspector verify UNGS operators are following their written procedures pertaining to notification of excavation, marking, positive response and the availability and use of the one call system? (API 1171 Section 11.10 Public Awareness and Damage Prevention) (Yes= 2 points, No= 0 Points, NI=1 Point)</p> <p>Comments: No. 0 of 2 points. The KS laws have not been delegated to KS-CC. This problem is under discussion.</p>	2
2	<p>Did the State encourage and promote practices for reducing damages to all underground facilities to its regulated companies? (Common Ground Alliance Best Practices, support excavation damage prevention legislation, etc.) (Yes= 2 points, No= 0 Points, NI=1 Point)</p> <p>Comments: No. 0 of 2 points. The KS laws have not been delegated to KS-CC. This problem is under discussion.</p>	2
3	<p>General Comments: 2 questions were 'No'. 4 points were lost. Score is 0 of 4.</p>	4

G – FIELD INSPECTIONS		
1	Operator, Inspector, Location, Date and PHMSA Representative Comments: Oneok, opid 30629, Jonathon Hill – Inspector, Brehm and Konold Gas Storage Facilities in Pratt County, KS, 6/26/2019, Patrick Gaume	
2	Was the operator or operator's representative notified and/or given the opportunity to be present during inspection? (Yes= 1 point, No= 0 Points) Comments: Yes, Two Oneok personnel were on-site, and one escorted us throughout the fields.	1
3	Did the inspector use an appropriate inspection form/checklist and was the form/checklist used as a guide for the inspection? (Yes= 2 points, No= 0 Points, NI=1 Point) Comments: Yes, KS-CC Wellhead Safety Inspection forms.	2
4	Did the inspector thoroughly document results of the inspection? (Yes= 2 points, No= 0 Points, NI=1 Point) Comments: Yes, the forms were completely filled out.	2
5	Did the inspector check to see if the operator had necessary equipment during inspection to conduct tasks viewed? (Yes= 1 point, No= 0 Points) Comments: Yes, it included a vehicle, full set of tools, calibrated pressure gauge, grease gun, etc.	1
6	Did the inspector adequately review the following during the field portion of the State Program Evaluation? <ul style="list-style-type: none"> • Procedures • Records • Field Activities/Facilities • Other (please comment) (Yes= 2 points, No= 0 Points, NI=1 Point) Comments: Yes. Field Activities only; Procedures and Records had been provided earlier.	2
7	Did the inspector have adequate knowledge of the UNGS safety program and regulations? (Evaluator will document reasons if unacceptable) (Yes= 2 points, No= 0 Points, NI=1 Point) Comments: Yes. Jon demonstrated a professional level of knowledge during the inspections.	2
8	Did the inspector conduct an exit interview? (If inspection is not totally complete the interview should be based on areas covered during time of field evaluation) (Yes= 1 point, No= 0 Points) Comments: Yes. Jon found issues with valves on three of the 20 wellsites visited, and several instances of improperly installed flanges.	1

9	During the exit interview, did the inspector identify probable violations found during the inspections? (if applicable) (Yes= 1 point, No= 0 Points) Comments: Yes. Jon found issues with valves on three of the 20 wellsites visited, and several instances of improperly installed flanges.	1																				
10	General Comments: All 12 points awarded in this Section. <ul style="list-style-type: none">What did the inspector observe in the field? (Narrative description of field observations and how inspector performed) The inspections were Wellhead Safety Inspections for all 20 wells in the Brehm and Konold Gas Storage Fields. All 20 sites were visited. 1 site was visited 4 times, and 2 others were visited twice. Areas of focus included site functionality, vehicle safety barriers, proper signs for safety and well identification, valve tests of the master valve and wing valve, general worthiness of the wellhead, atmospheric corrosion, and general awareness of looking for signs of leaks while touring the field. In addition, a well bore integrity log suite was spot checked throughout the day.Best Practices to Share with Other States - (Field - could be from operator visited or State inspector practices)Other Jon shared how he is revising the Wellhead Safety Inspection Form to address ‘copy-paste’ issues, and encourage more attention during the inspection.	12																				
	Field Observation Areas Observed (check all that apply)																					
	<table><tr><td>site functionality</td><td>Y</td></tr><tr><td>vehicle safety barriers</td><td>Y</td></tr><tr><td>proper signs for safety and well identification</td><td>Y</td></tr><tr><td>valve tests of the master valve and wing valve</td><td>Y</td></tr><tr><td>general worthiness of the wellhead</td><td>Y</td></tr><tr><td>atmospheric corrosion</td><td>Y</td></tr><tr><td>Facility awareness; any leaks, unusual activity, strange, out of place, etc.</td><td>Y</td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr></table>	site functionality	Y	vehicle safety barriers	Y	proper signs for safety and well identification	Y	valve tests of the master valve and wing valve	Y	general worthiness of the wellhead	Y	atmospheric corrosion	Y	Facility awareness; any leaks, unusual activity, strange, out of place, etc.	Y							
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H - 60106 AGREEMENT STATE (if applicable)		
1	<p>Did the State use the current federal inspection form(s)? (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p>Comments: NI. 0.5 of 1 points. The IA form was not used, nor were such inspections made it 2018. Learning how to use IA is a planned activity that is scheduled for 7/9/2019. Completely willing to use the Form when trained enough to use it.</p>	1
2	<p>Are results documented demonstrating inspection units were reviewed in accordance with State inspection plan? (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p>Comments: NI. 0.5 of 1 point. A State inspection plan has not been created yet, but all operators were visited.</p>	1
3	<p>Were any probable violations identified by State referred to PHMSA for compliance action? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.) (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p>Comments: NA. no violations were found.</p>	1
4	<p>Did the State immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p>Comments: NA. no imminent safety hazards were found.</p>	1
5	<p>Did the State give written notice to PHMSA within 60 days of all probable violations found? (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p>Comments: NA. no violations were found.</p>	1
6	<p>Did the State initially submit adequate documentation to support compliance action by PHMSA on probable violations? (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p>Comments: NA. no violations were found.</p>	1
7	<p>General Comments: 2 questions were NI. Loss of 1 point. 4 questions were NA. Score is 1 of 2.</p>	6