

**PHMSA UNDERGROUND NATURAL GAS STORAGE (UNGS)  
KS CC PROGRAM EVALUATION – CY2020  
CONDUCTED 6/7-11/2021**

<b>A – PROGRESS REPORT AND PROGRAM DOCUMENTATION REVIEW</b>	<b>8 of 9</b>
<b>B – PROGRAM INSPECTION PROCEDURES</b>	<b>13 of 13 (14)</b>
<b>C – PROGRAM PERFORMANCE</b>	<b>29 of 29 (34)</b>
<b>D – COMPLIANCE ACTIVITIES</b>	<b>15 of 15 (21)</b>
<b>E – INCIDENT INVESTIGATIONS</b>	<b>8 of 8 (13)</b>
<b>F – DAMAGE PREVENTION</b>	<b>4 of 4</b>
<b>G – FIELD INSPECTIONS</b>	<b>12 of 12</b>
<b>H - 60106 AGREEMENT STATE (if applicable)</b>	<b>NA, 0 of 0 (6)</b>
<b>TOTAL PROGRAM EVALUATION POINTS</b>	<b>89 of 90 (113)</b>

## PHMSA UNGS STATE PROGRAM EVALUATION – CY2020

<b>A – PROGRESS REPORT AND PROGRAM DOCUMENTATION REVIEW</b> <b>THIS SECTION ANALYZES ACCURACY AND COMPLETENESS OF ANNUAL PROGRESS REPORT</b>		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><b>Comments: Yes, is consistent with existing KS law, and in agreement with attachment 3 &amp; 8. Kansas Corporation Commission Utilities 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. <a href="mailto:Alexandria.lane@ks.gov">Alexandria.lane@ks.gov</a>, Office: 785-296-7254, Cell: 785-230-0741.]</b></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><b>Comments: Yes, 9.9 Field days is consistent with KS records.</b></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><b>Comments: Yes. 3 Operators and 4 Units are consistent with KS records.</b></p>	1
4	<p>Accuracy verification of Compliance Activities – Progress Report Attachment 5 (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: Yes, no compliance actions taken in 2020.</b></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><b>Comments: NI 1 of 2 points. There was delay in finding some records. Discussed the need to better define filing responsibilities, and to consider revising the names of the files.</b></p>	1
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><b>Comments: Yes, .06*220=13.2 man-days total charged to the UNGS Program. .05*220=11 inspector days charged to the UNGS program. The time is consistent with KS internal records.</b></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><b>Comments: Yes. The information in Attachment 8 is consistent with KS internal records.</b></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><b>Comments: Yes. Attachment 10 is a good summary of the status of the UNGS Program.</b></p>	1

9	<p><b>General Comments:</b></p> <p><b>Andrew J French, Chair</b>                      Leo Haynos, Chief Engineer; Patrick Gaume, UNGS Liaison, PHMSA</p> <p><b>Kansas Corporation Commission</b>                      Same address</p> <p><b>1500 SW Arrowhead Rd</b>                      60105 Program</p> <p><b>Topeka, KS 66604-4027</b>                      No incidents reported 2018-2020</p> <p><b>UNGS PROGRESS REPORT REVIEW score is 41 of 50: 4 pt. reduction due to highest percentage of inspectors are in Category 1, II and III; 2 pt. reduction due to Maximum Civil Penalties are inadequate; and 3 pt. reduction as some federal regulations have not been adopted within 2 years/2 legislative sessions but steps are being taken to adopt.</b></p> <p><b>No incidents were reported in UNGS for 2020.</b></p> <p><b>Part A scored 8 of 9 points. Question 5 was NI for a 1-point reduction.</b></p>	8
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<b>B – PROGRAM INSPECTION PROCEDURES</b> Does State Inspection Plan include procedures that address the following elements? (See Guidelines Section 5.1)		
1	Does State have written inspection procedures? (Yes= 2 points, No= 0 Points, NI=1 point) <b>Comments: Yes. The existing Pipeline Procedures have been expanded to include UNGS.</b>	2
2	<p><b>Standard Inspections</b></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. (Review of Procedures, Records, or Field Items to complete a PHMSA UNGS IA Question Set (RESERVOIR or CAVERN) – 2019.12.31)</p> <ul style="list-style-type: none"> <li>• Pre-Inspection Activities</li> <li>• Inspection Activities</li> </ul> <p>Post Inspection Activities (Yes= 2 points, No= 0 Points, NI=1 point)  <b>Comments: Yes, See Section 5.4.2; Part A) for pre-inspection and Part C) for post-inspection.</b></p>	2
3	<p><b>Integrity Management Inspections</b></p> <ul style="list-style-type: none"> <li>• Do Integrity Management 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. (Integrity Testing and Maintenance: Observing Integrity Testing (Tubing, Casing, Cement), reservoir integrity monitoring, &amp; FLIR Camera inspections.)</li> <li>• Pre-Inspection Activities</li> <li>• Inspection Activities</li> </ul> <p>Post Inspection Activities (Yes= 2 points, No= 0 Points, NI=1 point)  <b>Comments: Yes. See Section 5.4.2 &amp; 5.5.4.</b></p>	2
4	<p><b>Design, Testing, and Construction Inspections</b></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. (Review of procedures, records, and field activities to complete PHMSA UNGS IA Question Set (RESERVOIR or CAVERN CONSTRUCTION) – 2019.12.31. Inspection activities for well design, drilling and completion activities, well workover, reservoir maintenance/repair activities, and abandonment (Plugging and cementing), temporary abandonment, and restoration.)</p> <ul style="list-style-type: none"> <li>• Pre-Inspection Activities</li> <li>• Inspection Activities</li> <li>• Post Inspection Activities</li> </ul> <p>(Yes= 1 point, No= 0 Points, NI=.5 point)  <b>Comments: Yes. See Section 5.4.2 &amp; 5.5.2.</b></p>	1

5	<p><b>Wellhead Inspections</b></p> <p>Do Wellhead 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"> <li>• Pre-Inspection Activities</li> <li>• Inspection Activities</li> <li>• Post Inspection Activities</li> </ul> <p>(Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: NA. Unique wellhead inspections are not done in KS; they are part of Standard Inspections and reported through IA.</b></p>	NA
6	<p><b>Drug and Alcohol Inspections</b></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. (Using AI to complete the federal Comprehensive Drug and Alcohol program (Form 3.1.11). Includes time conducting joint inspections with other agencies for this type of inspection.)</p> <ul style="list-style-type: none"> <li>• Pre-Inspection Activities</li> <li>• Inspection Activities</li> <li>• Post Inspection Activities</li> </ul> <p>(Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: Yes. See Section 5.5.9. D&amp;A is generally included in HQ inspections. With spot D&amp;A during Unit inspections.</b></p>	1
7	<p>Does inspection plan address inspection priorities of each inspection unit, based on the following elements?</p> <ul style="list-style-type: none"> <li>• <b>Length of time since last inspection (Within five-year interval per inspection unit)</b></li> <li>• <b>Operating history of operator/unit and/or location (includes leakage, incident, Integrity Testing, and compliance activities)</b></li> <li>• <b>Type of activity being undertaken by operators in inspection units (i.e. construction)</b></li> <li>• <b>Locations of operator's inspection units being inspected - (Geographic area, Population Density, etc.)</b></li> <li>• <b>Process to identify high-risk inspection units considering integrity threats</b></li> <li>• <b>Are inspection units broken down appropriately?</b></li> </ul> <p>(Yes= 5 points, No= 0 Points, NI=1-4 points)</p> <p><b>Comments: Yes. See Section 5.3.1.</b></p>	5
8	<p><b>General Comments: Part B scored 13 of 13 points. Question 5 was NA.</b></p>	13

C – PROGRAM PERFORMANCE		
1	<p>Was ratio of Total Inspection Person-Days to Total Person-Days acceptable? (Chapter 4.2)</p> <p><b>A = Total Inspection Person Days (Attachment 2)</b>  <b>B = Total Inspection Person Days Charged to the program</b>  <b>(220 x Number of Inspection person years from Attachment 7)</b>  <b>Ratio = A/B      If Ratio &gt;= .38 then score = 5 points. If Ratio &lt; .38 then score = 0 points.</b>          (Yes= 5 points, No= 0 Points)  <b>Comments: Yes. 9.9 Field days, 0.05 inspector years. 9.9/((.05*220)=.9. .9&gt;.38, okay.</b></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)          (Yes= 5 points, No= 0 Points, NI=1-4)  <b>Comments: Yes, In 3rd year of the UNGS Program. Leo and Lyle Powers are scheduled to take the UNGS Course.</b></p>	5
3	<p>Does State use the PHMSA Inspection Assistant (IA) program to document inspections?          (Yes= 2 points, No= 0 Points, NI=1 point)  <b>Comments: Yes, KS is using IA.</b></p>	2
4	<p>Did records and discussions with Program Manager indicate adequate knowledge of PHMSA program and regulations? Chapter 4.1,8.1          (Yes= 2 points, No= 0 Points, NI=1 point)  <b>Comments: Yes. Leo is quite experienced.</b></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          (Yes= 2 points, No= 0 Points, NI=1 point)  <b>Comments: NA. Leo has no record of receiving the Nov 10, 2020 email from Zach; and therefore never had a prompt to generate a response. A copy of the Nov 10, 2020 email was received by Leo today, 6/7/21. A response was received on 6/11/21; within 4 days.</b></p>	NA
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          (Yes= 5 points, No= 0 Points, NI=1-4 points)  <b>Comments: Yes. Inspections are within the maximum 5-year interval. Discussed that Cherokee has not had an UNGS Standard Inspection in 2018-2020, and should be scheduled soon.</b></p>	5
7	<p>Did State Inspection form(s) cover all applicable code requirements addressed on Federal Inspection form(s)? Chapter 5.1          (Yes= 2 points, No= 0 Points, NI=1 point)  <b>Comments: Yes. Is being done but not yet due. See Section 5.5.1 for a 5-year interval. 2020 was the 3rd year of this program.</b></p>	2
8	<p>Did State complete all applicable portions of inspection forms?          (Yes= 2 points, No= 0 Points, NI=1 point)  <b>Comments: Yes. Is being done but not yet due. See Section 5.5.1 for a 5-year interval. 2020 was the 3rd year of this program.</b></p>	2
9	<p>Has the State reviewed Operator Annual reports, along with Incident reports, for accuracy and analyzed data for trends and operator issues?          (Yes= 2 points, No= 0 Points, NI=1 point)  <b>Comments: Yes. The annual reports are reviewed.</b></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><b>Comments: Yes. Handled by HQ reviews. One Operator, Cherokee, is targeted for a specific D&amp;A.</b></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><b>Comments: Yes. Hold annual 192 Training sessions with exception of 2020 (Covid 19). Website has several things posted. Okay.</b></p>	1
12	<p>Did State execute appropriate follow-up actions to Safety Related Condition Reports (SRCR)? Chapter 6.3</p> <p>(Yes= 1 points, No= 0 Points, NI=.5 point)</p> <p><b>Comments: NA. No UNGS related SRC.</b></p>	NA
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><b>Comments: Yes. KS responds to various PHMSA requests.</b></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><b>Comments: NA. No special permits in KS.</b></p>	NA
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><b>Comments: NA. No special permits in KS.</b></p>	NA
16	<p><b>General Comments: Part C scored 29 of 29 points. Questions 5, 12, 14 &amp; 15 were NA.</b></p>	29

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"> <li>• <b>Procedures to notify an operator (company officer) when a noncompliance is identified (60105 States)</b></li> <li>• <b>Procedures to routinely review progress of compliance actions to prevent delays or breakdowns</b></li> <li>• <b>Procedures regarding closing outstanding probable violations</b></li> </ul> <p>(Yes= 4 points, No= 0 Points, NI=1-3 points)  <b>Comments: Yes. See Section 5.7 &amp; 5.8.</b></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"> <li>• Were compliance actions sent to company officer or manager/board member if municipal/government system (60105 States)?</li> <li>• Document probable violations</li> <li>• Resolve probable violations</li> <li>• Routinely review progress of probable violations</li> </ul> <p>(Yes= 4 points, No= 0 Points, NI=1-3 points)  <b>Comments: NA. There have been no compliance issues for UNGS. It is expected that KS procedures will be followed for probable violations.</b></p>	NA
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)  <b>Comments: Yes. The Atmos inspection had an exit briefing on the last day of the inspection.</b></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)  <b>Comments: Yes. A completion letter was sent 6 weeks after the inspection.</b></p>	2
5	<p>Did the State issue compliance actions for all probable violations discovered (60105 States)?</p> <p>(Yes= 2 points, No= 0 Points, NI=1 point)  <b>Comments: Yes. Procedures are in place. No UNGS violations in 2020.</b></p>	2
6	<p>Did compliance actions give reasonable due process to all parties? Including "show cause" hearing if necessary (60105 States).</p> <p>(Yes= 2 points, No= 0 Points)  <b>Comments: Yes. Procedures are in place. No UNGS violations in 2020.</b></p>	2



7	<p>Is the Program Manager familiar with State process for imposing civil penalties (60105 States)? (describe any actions taken)</p> <p>(Yes= 2 points, No= 0 Points, NI=1 point)</p> <p><b>Comments: Yes. Leo is completely familiar with KS process for imposing civil penalties.</b></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 (60105 States)? (Yes= 2 points, No= 0 Points, NI=1 point)</p> <p><b>Comments: NA. No violations were found. Process is in place.</b></p>	NA
9	<p>Can the State demonstrate it is using their enforcement fining authority for safety violations (60105 States)? (Yes= 1 point, No= 0 Points, NI= .5 point)</p> <p><b>Comments: Yes. See Section 5.13. 32 penalties totaling \$28,000 were issued and collected in 2020 for pipeline violations.</b></p>	1
10	<p><b>General Comments: Part D scored 15 of 15 points. Questions 2 &amp; 8 were NA.</b></p>	15

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><b>Comments: Yes. See Section 6.1</b></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><b>Comments: Yes. See Section 6.1, also regulation K.A.R. 82-11-7 (b)</b></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><b>Comments: Yes. None were received in 2020 but records are kept per Section 6.1.</b></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><b>Comments: NA. No incidents or investigations in 2020.</b></p>	NA
5	<p>Were all incidents investigated, thoroughly documented, and with conclusions and recommendations?</p> <ul style="list-style-type: none"> <li>• <b>Observations and document review</b></li> <li>• <b>Contributing Factors</b></li> <li>• <b>Recommendations to prevent recurrences where appropriate</b></li> </ul> <p>(Yes= 3 points, No= 0 Points, NI=1-2 points)</p> <p><b>Comments: NA. none in 2020. Incidents will be handled per Section 6.1.</b></p>	NA
6	<p>Did the State initiate compliance action for violations found during any incident investigation? (60106 States forward violations to PHMSA) (Yes= 1 point, No= 0 Points)</p> <p><b>Comments: NA. none in 2020. Compliance will be handled per Section 5.13.</b></p>	NA
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><b>Comments: Yes. No requests in 2020, but KS has helped in the past.</b></p>	1
8	<p>Does State share lessons learned from incidents with PHMSA? (Yes= 1 point, No= 0 Points)</p> <p><b>Comments: Yes. Incidents are reported during NAPS Region Meetings.</b></p>	1

9	General Comments: Part E scored 8 of 8 points. 3 questions, #4, 5, & 6 were NA	8
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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><b>Comments: Yes. See Sections 5.6 &amp; 7.1</b></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><b>Comments: Yes. See Sections 5.6 &amp; 7.1</b></p>	2
3	<p><b>General Comments: Section F scored 4 of 4 points. No problems.</b></p>	4

G – FIELD INSPECTIONS		
1	Operator, Inspector, Location, Date and PHMSA Representative <b>Comments: Mid-Continent Market Center, opid 32363; Lyle Powers, Pipeline Safety Inspector II; Brehm &amp; Konold Gas Storage Fields, Pratt Co, KS; 6/9/21; Patrick Gaume – PHMSA</b>	
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) <b>Comments: Yes. One field personnel was present.</b>	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) <b>Comments: Yes. Field questions from the IA form were used.</b>	2
4	Did the inspector thoroughly document results of the inspection? (Yes= 2 points, No= 0 Points, NI=1 Point) <b>Comments: Yes. The targeted questions in this special Field inspection were documented.</b>	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) <b>Comments: Yes. PPE, hand tools, keys, pickup, first aid equipment.</b>	1
6	Did the inspector adequately review the following during the field portion of the State Program Evaluation? <ul style="list-style-type: none"> <li>• Procedures</li> <li>• Records</li> <li>• Field Activities/Facilities</li> <li>• Other (please comment)</li> </ul> (Yes= 2 points, No= 0 Points, NI=1 Point) <b>Comments: Yes. This was a field facilities inspection; focused on atmospheric corrosion, signs, markers, site security, valve security, valve operation, rectifiers, &amp; soil/air interface.</b>	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) <b>Comments: Yes. Lyle demonstrated professional knowledge during the inspection.</b>	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) <b>Comments: Yes. Sites were clean, well maintained, and no violations were found.</b>	1

[illegible]

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><b>Comments: NA, KS is a 60105 Program.</b></p>	NA
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><b>Comments: NA, KS is a 60105 Program.</b></p>	NA
3	<p>Were all 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><b>Comments: NA, KS is a 60105 Program.</b></p>	NA
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><b>Comments: NA, KS is a 60105 Program.</b></p>	NA
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><b>Comments: NA, KS is a 60105 Program.</b></p>	NA
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><b>Comments: NA, KS is a 60105 Program.</b></p>	NA
7	<p><b>General Comments: Part H is NA, KS is a 60105 Program.</b></p>	NA