



U.S. Department  
of Transportation  
**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue SE  
Washington DC 20590

## 2020 Gas State Program Evaluation

for

Minnesota Office of Pipeline Safety

### Document Legend

#### PART:

- O -- Representative, Dates and Title Information
- A -- Progress Report and Program Documentation Review
- B -- Program Inspection Procedures
- C -- State Qualifications
- D -- Program Performance
- E -- Field Inspections
- F -- Damage prevention and Annual report analysis
- G -- Interstate Agent/Agreement States



# 2020 Gas State Program Evaluation -- CY 2020

Gas

**State Agency:** Minnesota

**Agency Status:**

**Date of Visit:** 08/03/2020 - 08/11/2020

**Agency Representative:** Jonathan Wolfgram

**PHMSA Representative:** Joe Subsits, Rex Evans

**Commission Chairman to whom follow up letter is to be sent:**

**Name/Title:** John Harrington, Chairman

**Agency:** MNOPS

**Address:** 445 Minnesota Street, Suite 1000

**City/State/Zip:** St. Paul, MN 55101

**Rating:**

**60105(a):** Yes **60106(a):** No **Interstate Agent:** Yes

## INSTRUCTIONS:

Complete this evaluation in accordance with the Evaluator Guidance for conducting state pipeline safety program evaluations. The evaluation should generally reflect state program performance during CY 2020 (not the status of performance at the time of the evaluation). A deficiency in any one part of a multiple-part question should be scored as "Needs Improvement." Determine the answer to the question then select the appropriate point value. If a state receives less than the maximum points, include a brief explanation in the appropriate notes/comments section. If a question is not applicable to a state, select NA. Please ensure all responses are COMPLETE and ACCURATE, and they OBJECTIVELY reflect the state's program performance for the question being evaluated. Increasing emphasis is being placed on how the state pipeline safety programs conduct and execute their pipeline safety responsibilities (their performance). This evaluation, together with selected factors reported in the state's annual progress report attachments, provide the basis for determining the state's pipeline safety grant allocation.

## Scoring Summary

### PARTS

A	Progress Report and Program Documentation Review
B	Program Inspection Procedures
C	State Qualifications
D	Program Performance
E	Field Inspections
F	Damage prevention and Annual report analysis
G	Interstate Agent/Agreement States

### Possible Points Points Scored

0	0
15	15
10	10
50	50
15	15
10	10
0	0
<b>100</b>	<b>100</b>

### TOTALS

**State Rating** ..... **100.0**

## PART A - Progress Report and Program Documentation Review

Points(MAX)    Score

- 1    Were the following Progress Report Items accurate? (\*items not scored on progress report)    Info Only    Info Only
- Info Only = No Points
- a.    Stats On Operators Data - Progress Report Attachment 1
  - b.    State Inspection Activity Data - Progress Report Attachment 2
  - c.    List of Operators Data - Progress Report Attachment 3\*
  - d.    Incidents/Accidents Data - Progress Report Attachment 4\*
  - e.    Stats of Compliance Actions Data - Progress Report Attachment 5\*
  - f.    List of Records Kept Data - Progress Report Attachment 6 \*
  - g.    Staff and TQ Training Data - Progress Report Attachment 7
  - h.    Compliance with Federal Regulations Data - Progress Report Attachment 8
  - i.    Performance and Damage Prevention Question Data - Progress Report Attachment 10\*

### Evaluator Notes:

Operator list generated off the Sales Force data base. Data base numbers matched the progress report. There were three Federally reportable gas incidents in 2020 including an LNG incident that occurred at the end of 2020. Compliance numbers in the progress report match data base numbers. The inspector qualification attachment is in concurrence with T&Q blackboard. The last adoption date for Federal rules was 7/1/2020.

Total points scored for this section: 0  
Total possible points for this section: 0



## PART B - Program Inspection Procedures

Points(MAX) Score

- |   |   |   |   |
|---|---|---|---|
| 1 | Do written procedures address pre-inspection, inspection and post inspection activities for each of the following inspection types: Chapter 5.1<br>Yes = 5 No = 0 Needs Improvement = 1-4   | 5 | 5 |
|   | <ul style="list-style-type: none"><li>a. Standard Inspections, which include Drug/Alcohol, CRM and Public Awareness Effectiveness Inspections</li><li>b. TIMP and DIMP Inspections (reviewing largest operator(s) plans annually)</li><li>c. OQ Inspections</li><li>d. Damage Prevention Inspections</li><li>e. On-Site Operator Training</li><li>f. Construction Inspections (annual efforts)</li><li>g. LNG Inspections</li></ul> |   |   |

### Evaluator Notes:

Pre and post inspection procedures are found in section 5.1. Standard inspections pre and post procedures are found in section 5.2.1, control room management inspections are found in 5.2.7, Public awareness inspections are found in section 5.2.8 and 5.2.9 for drug and alcohol control inspections. TIMP and DiMP inspections are found in section 5.2.3. OQ pre and post inspection procedures are found in section 5.2.4. Construction pre and post construction procedures are found in section 5.2.2. Operator training is covered in section 5.2.3 and LNG inspections are covered in Section 5.2.11.

- |   |   |   |   |
|---|---|---|---|
| 2 | Do written procedures address inspection priorities of each operator, and if necessary each unit, based on the following elements and time frames established in its procedures? Chapter 5.1<br>Yes = 4 No = 0 Needs Improvement = 1-3  | 4 | 4 |
|   | <ul style="list-style-type: none"><li>a. Length of time since last inspection</li><li>b. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities)</li><li>c. Type of activity being undertaken by operators (i.e. construction)</li><li>d. Locations of operator's inspection units being inspected - (HCA's, Geographic area, Population Centers, etc.)</li><li>e. Process to identify high-risk inspection units that includes all threats - (Excavation Damage, Corrosion, Natural Forces, Outside Forces, Material and Welds, Equipment, Operators and any Other Factors)</li><li>f. Are inspection units broken down appropriately?</li></ul> |   |   |

### Evaluator Notes:

Procedures are found in Section 12.1 of the operating procedures. Risk model considers length of time since last inspection, operating history of operator, unit and location. There is a process to identify high risk operators. Risk is assessed on a company level. The assessment tool was developed internally. All operators are inspected annually.

- |   |   |   |   |
|---|---|---|---|
| 3 | (Compliance Procedures) Does the state have written procedures to identify steps to be taken from the discovery to resolution of a probable violation? Chapter 5.1<br>Yes = 3 No = 0 Needs Improvement = 1-2  | 3 | 3 |
|   | <ul style="list-style-type: none"><li>a. Procedures to notify an operator (company officer) when a noncompliance is identified</li><li>b. Procedures to routinely review progress of compliance actions to prevent delays or breakdowns</li><li>c. Procedures regarding closing outstanding probable violations</li></ul> |   |   |

### Evaluator Notes:

Procedures to notify operators of probable violations are found in Section 5.3.1. The operator is notified of non compliant issues during exit interview and in writing. Compliance follow is found in Sections 5.3.1 (2) & (3). Key dates are tracked in Sales Force. Open compliance cases are queried to ensure there are no items left opened. Closure activities are found in Section 5.26.

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|---|--|---|---|
| 4 | (Incident/Accident Investigations) Does the state have written procedures to address state actions in the event of an incident/accident?<br>Yes = 3 No = 0 Needs Improvement = 1-2 | 3 | 3 |
|---|--|---|---|

- a. Mechanism to receive, record, and respond to operator reports of incidents, including after-hours reports
- b. If onsite investigation was not made, do procedures require on-call staff to obtain sufficient information to determine the facts to support the decision not to go on-site.

Evaluator Notes:

Section 11.8 requires 24 hour notification of incidents to the Minnesota OPS duty officer. Section 11.9 addresses coordination with the State emergency operations center. Section 6 and 6.1 address the need to collect information needed to prevent reoccurrence of incidents.

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**5** General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

Minnesota procedures covered the required items.

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Total points scored for this section: 15  
Total possible points for this section: 15



## PART C - State Qualifications

Points(MAX) Score

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|---|---|---|---|
| 1 | Has each inspector and program manager fulfilled training requirements? (See Guidelines Appendix C for requirements) Chapter 4.4<br>Yes = 5 No = 0 Needs Improvement = 1-4  | 5 | 5 |
|   | <ul style="list-style-type: none"><li>a. Completion of Required OQ Training before conducting inspection as lead</li><li>b. Completion of Required DIMP/IMP Training before conducting inspection as lead</li><li>c. Completion of Required LNG Training before conducting inspection as lead</li><li>d. Root Cause Training by at least one inspector/program manager</li><li>e. Note any outside training completed</li><li>f. Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector (Reference State Guidelines Section 4.3.1)</li></ul> |   |   |

Evaluator Notes:

Inspection reviewed were performed by qualified personnel. This included review of inspection work for TIMP/DIMP and LNG inspections. All inspection are eventually scheduled to complete the root cause training. Training is tracked using a matrix. Minnesota tries to get annual training annually. Jon will typically invite neighboring states to the training sessions.

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|---|--|---|---|
| 2 | Did state records and discussions with state pipeline safety program manager indicate adequate knowledge of PHMSA program and regulations? Chapter 4.1,8.1<br>Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
|---|--|---|---|

Evaluator Notes:

Jon has been with the Minnesota Office of Pipeline Safety for 13 years . He is fully certified through T&Q. He is knowledgeable of pipeline safety issues and currently serves as secretary of NAPSRS.

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|---|--|-----------|-----------|
| 3 | General Comments:<br>Info Only = No Points | Info Only | Info Only |
|---|--|-----------|-----------|

Evaluator Notes:

Minnesota serves as interstate agents and have a well qualified staff. Most staff is fully certified through T&Q.

Total points scored for this section: 10  
Total possible points for this section: 10



## PART D - Program Performance

Points(MAX) Score

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|---|---|---|---|
| 1 | Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1<br>Yes = 5 No = 0 Needs Improvement = 1-4  | 5 | 5 |
|   | <ul style="list-style-type: none"><li>a. Standard (General Code Compliance)</li><li>b. Public Awareness Effectiveness Reviews</li><li>c. Drug and Alcohol</li><li>d. Control Room Management</li><li>e. Part 193 LNG Inspections</li><li>f. Construction (did state achieve 20% of total inspection person-days?)</li><li>g. OQ (see Question 3 for additional requirements)</li><li>h. IMP/DIMP (see Question 4 for additional requirements)</li></ul> |   |   |

Evaluator Notes:

Inspections were conducted in accordance with the frequencies identified in Minnesota's procedures. This include Standard, public awareness, drug and alcohol, control room, LNG, operator qualification and integrity management inspections (Transmission and Distribution). Future inspection dates are auto populated into the data base.

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|---|---|----|----|
| 2 | Did inspection form(s) cover all applicable code requirements addressed on Federal Inspection form(s)? Did State complete all applicable portions of inspection forms? Chapter 5.1. Do inspection records indicate that adequate reviews of procedures, records and field activities, including notes and the appropriate level of inspection person-days for each inspection, were performed?<br>Yes = 10 No = 0 Needs Improvement = 1-9 | 10 | 10 |
|   | <ul style="list-style-type: none"><li>a. Standard (General Code Compliance)</li><li>b. Public Awareness Effectiveness Reviews</li><li>c. Drug and Alcohol</li><li>d. Control Room Management</li><li>e. Part 193 LNG Inspections</li><li>f. Construction</li><li>g. OQ (see Question 3 for additional requirements)</li><li>h. IMP/DIMP (see Question 4 for additional requirements)</li></ul>  |    |    |

Evaluator Notes:

IA is used for all inspections except propane inspections. 20% of the Minnesota's inspection reports were reviewed along with previous inspection dates. Inspection forms were complete. No issues were found.

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| 3 | Is state verifying monitoring (Protocol 9/Form15) of operators OQ programs? This should include verification of any plan updates and that persons performing covered tasks (including contractors) are properly qualified and requalified at intervals established in the operator's plan. 49 CFR 192 Part N<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

OQ inspections are tracked through sales force. OQ Questions for standard IA questions were checked and found to include the appropriate OQ questions.

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| 4 | Is state verifying operator's integrity management Programs (IMP and DIMP)? This should include a review of plans, along with monitoring progress. In addition, the review should take in to account program review and updates of operator's plan(s). 49 CFR 192 Subpart P<br>Yes = 2 No = 0 Needs Improvement = 1   | 2 | 2 |
|   | <ul style="list-style-type: none"><li>a. Are the state's largest operator(s) plans being reviewed annually to ensure they are completing the full cycle of the DIMP/IMP process?</li><li>b. Are states verifying with operators any plastic pipe and components that have shown a record of defects/leaks and mitigating those through DIMP plan?</li><li>c. Are the states verifying operators are including low pressure distribution systems in their threat analysis?</li></ul> |   |   |

Evaluator Notes:

Specialized IM inspections are done on the three biggest operators. Problematic plastic pipe and components are determined during annual field and record inspections. Alert notices and advisory bulletins are sent to the appropriate intrastate operators.

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| 5 | Did the state review the following (these items are NTSB recommendations to PHMSA that have been deemed acceptable response based on PHMSA reviewing these items during the evaluation process): Chapter 5.1<br>Yes = 2 No = 0 Needs Improvement = 1  | 2 | 2 |
|   | <ul style="list-style-type: none"><li>a. Operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken;</li><li>b. Operator procedures for surveillance of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leakage history, or other unusual operating maintenance condition? (Note: See GPTC Appendix G-18 for guidance);</li><li>c. Operator emergency response procedures for leaks caused by excavation damage near buildings and determine whether the procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings Refer to 4/12/01 letter from PHMSA in response to NTSB recommendation P-00-20 and P-00-21;</li><li>d. Operator records of previous accidents and failures including reported third-party damage and leak response to ensure appropriate operator response as required by 192.617;</li><li>e. Directional drilling/boring procedures of each pipeline operator or its contractor to determine if they include actions to protect their facilities from the dangers posed by drilling and other trench less technologies;</li><li>f. Operator procedures for considering low pressure distribution systems in threat analysis?</li><li>g. Operator compliance with state and federal regulations for regulators located inside buildings?</li></ul> |   |   |

Evaluator Notes:

The state will send out requests for information to inquire on the extent of various issues of interest. The request for information is done electronically. There is no cast iron in Minnesota. Multiple leaks from excavation damage is addressed in the IA checklist and is also on the investigation form. Checklists are electronic and found on computer, IPADS and iPhones. Excavation damage from excavation damage is found in the IA considerations.. Low pressure systems and indoor meter sets are addressed in advisory bulletins which were sent to operators. A presentation was also made on the Silver Springs Maryland incident was made to operators during a safety seminar.

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|---|--|---|---|
| 6 | Did the State verify Operators took appropriate action regarding advisory bulletins issued since the last evaluation? (Advisory Bulletins Current Year)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|--|---|---|

Evaluator Notes:

The Federal advisory bulletin is hyperlinked to the state's advisory bulletin. Advisory bulletins are sent to state operators. Bulletins for low pressure systems and indoors meter sets were distributed.

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|---|--|----|----|
| 7 | (Compliance Activities) 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<br>Yes = 10 No = 0 Needs Improvement = 1-9  | 10 | 10 |
|   | <ul style="list-style-type: none"><li>a. Were compliance actions sent to company officer or manager/board member if municipal/government system?</li><li>b. Were probable violations documented properly?</li><li>c. Resolve probable violations</li><li>d. Routinely review progress of probable violations</li><li>e. Did state issue compliance actions for all probable violations discovered?</li><li>f. Can state demonstrate fining authority for pipeline safety violations?</li><li>g. Does Program Manager review, approve and monitor all compliance actions? (note: Program Manager or Senior Official should sign any NOPV or related enforcement action)</li></ul> |    |    |



- h. Did state compliance actions give reasonable due process to all parties?  
Including "show cause" hearing, if necessary.
- i. Within 30 days, conduct a post-inspection briefing with the owner or operator outlining any concerns
- j. Within 90 days, to the extent practicable, provide the owner or operator with written preliminary findings of the inspection. (Incident investigations do not need to meet 30/90-day requirement)

**Evaluator Notes:**

20% of the 2020 inspections were evaluated including review of compliance activities. Compliance actions were found to be timely and appropriate. Compliance action are routed through pipeline safety management. Compliance activities were appropriately documented.

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|----------|--|----|----|
| <b>8</b> | <b>(Incident Investigations) Were all federally reportable incidents investigated, thoroughly documented, with conclusions and recommendations?</b><br>Yes = 10 No = 0 Needs Improvement = 1-9 | 10 | 10 |
|----------|--|----|----|
- a. Does state have adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports?
  - b. Did state keep adequate records of Incident/Accident notifications received?
  - c. If onsite investigation was not made, did the state obtain sufficient information from the operator and/or by means to determine the facts to support the decision not to go on site?
  - d. Were onsite observations documented?
  - e. Were contributing factors documented?
  - f. Were recommendations to prevent recurrences, where appropriate, documented?
  - g. Did state initiate compliance action for any violations found during any incident/accident investigation?
  - h. Did state assist 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?
  - i. Does state share any lessons learned from incidents/accidents?

**Evaluator Notes:**

The Woodbury third party damage investigation was reviewed. Notification documentation, penalty letter, operator response and closure letter were reviewed and no issues were noted. Also reviewed was the 12/31/2020 LNG incident. The investigation report and Notice of violation were reviewed, This case is still open and currently being negotiated. This case is moving in a satisfactory manner.

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|----------|--|---|---|
| <b>9</b> | <b>Did state respond to Chairman's letter on previous evaluation within 60 days and correct or address any noted deficiencies? (If necessary) Chapter 8.1</b><br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

**Evaluator Notes:**

The 10/23/20 letter to John Harrington did not require a response to PHMSA.

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|-----------|--|-----------|-----------|
| <b>10</b> | <b>Did State conduct or participate in pipeline safety training session or seminar in Past 3 Years? Chapter 8.5</b><br>Info Only = No Points | Info Only | Info Only |
|-----------|--|-----------|-----------|

**Evaluator Notes:**

A pipeline safety seminar is conducted annually. The last seminar was conducted on 4/14/2020. This seminar was conducted virtually. The seminar is conducted simultaneously for gas and liquid operators. The seminar has 3 concurrent sessions.

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|-----------|---|-----------|-----------|
| <b>11</b> | <b>Has state confirmed transmission operators have submitted information into NPMS database along with changes made after original submission?</b><br>Info Only = No Points | Info Only | Info Only |
|-----------|---|-----------|-----------|

**Evaluator Notes:**

This issue is handled and addressed in the inspection Assistant (IA).

- 12** Does the state have a mechanism for communicating with stakeholders - other than state pipeline safety seminar? (This should include making enforcement cases available to public). 1 1  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

There is a stakeholder page on the Minnesota OPS web page. The web site houses forms, alert notices, conference information. E-mail blasts are done as needed. A holiday mailing is done and include PHMSA advisory bulletins.

- 13** Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.3 1 1  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

There was one SRC. Northern Natural Gas had an MOAP exceedance. A case was developed and investigation checklist was filled out. A report and recommendation was sent to PHMSA Central Regional Office. PHMSA sent a warning letter out.

- 14** Was the State responsive to: 1 1  
Yes = 1 No = 0 Needs Improvement = .5  
a. Surveys or information requests from NAPSRS or PHMSA; and  
b. PHMSA Work Management system tasks?

Evaluator Notes:

NAPSRS surveys are completed by Jon. Jon also checks IM notifications and updates WMS.

- 15** 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. 1 1  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

There are four waivers on the PHMSA web site. Two of the waivers are considered closed. Two Centerpoint Energy waivers to extend ECDA reassessment intervals were extended to 12/31/2021. The frequency reduction was granted to accommodate line replacement which will occur by next year. Jon was familiar with the status of these waivers.

- 16** Were pipeline program files well-organized and accessible? Info Only Info Only  
Info Only = No Points

Evaluator Notes:

Files are managed electronically.

- 17** Discussion with State on accuracy of inspection day information submitted into State Inspection Day Calculation Tool (SICT). Has the state updated SICT data? 3 3  
Yes = 3 No = 0 Needs Improvement = 1-2

Evaluator Notes:

2020 SICT numbers were calculated at 721 days. The progress report listed 934 days. Construction days were 22% of the days.

- 18** Discussion on State Program Performance Metrics found on Stakeholder Communication Info Only Info Only  
site.\ <http://primis.phmsa.dot.gov/comm/states.htm?nocache=4805>  
Info Only = No Points

Evaluator Notes:

Damages per 1000 miles holding steady between 2 and 2.5 damages per 1000 miles. The trend shows a slight decrease. Gas inspection days per 100 miles shows a slight increase from 2013. Master meter and LPG inspections showed a slight increase with a drop in 2020. There were two retirements and a job change last year. This may account for the drop. Gas inspector qualification lines are trending upward. Leaks and hazardous leaks have been trending downward with repairs trending upwards. PHMSA certification enforcement and investigation review have consistently maxed out.

- 19** Did the state encourage and promote operator implementation of Pipeline Safety Management Systems (PSMS), or API RP 1173? This holistic approach to improving pipeline safety includes the identification, prevention and remediation of safety hazards. Info Only Info Only  
Info Only = No Points
- a. <https://pipelinesms.org/>
  - b. Reference AGA recommendation to members May 20, 2019

Evaluator Notes:

SMS requirements have been put into compliance orders. SMS has also been a topic in State safety seminars.

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- 20** General Comments: Info Only Info Only  
Info Only = No Points

Evaluator Notes:

Files, Forms and correspondence are electronically maintained in the Sales Force data base. IA is used as is the inspection form for state inspections. Inspection day requirements were met.

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Total points scored for this section: 50  
Total possible points for this section: 50



## PART E - Field Inspections

Points(MAX) Score

- 1 Operator, Inspector, Location, Date and PHMSA Representative (enter specifics into the comments box below) Info Only Info Only

Info Only = No Points

- What type of inspection(s) did the state inspector conduct during the field portion of the state evaluation? (i.e. Standard, Construction, IMP, etc)
- When was the unit inspected last?
- Was pipeline operator or representative present during inspection?
- Effort should be made to observe newest state inspector with least experience

### Evaluator Notes:

Joe Subits of PHMSA witnessed three Minnesota construction inspection of excel on 8/5/2021. Elizabeth Selnik inspection the Wescott LNG project. Estelle Hickman inspected a service replacement due to to main replacement project in South St Paul and Pat Donovan inspected a service main replacement project in St Cloud.

Company contractors and the company compliance officer were on-site during the inspections.

- 2 Did the inspector use an appropriate inspection form/checklist and was the form/checklist used as a guide for the inspection? (New regulations shall be incorporated) 2 2

Yes = 2 No = 0 Needs Improvement = 1

### Evaluator Notes:

All inspectors used IA loaded onto an IPAD. Elizabeth used her laptop since she was working in a company conference room.

- 3 Did the inspector adequately review the following during the inspection 10 10

Yes = 10 No = 0 Needs Improvement = 1-9

- Procedures (were the inspector's questions of the operator adequate to determine compliance?)
- Records (did the inspector adequately review trends and ask in-depth questions?)
- Field Activities/Facilities (did inspector ensure that procedures were being followed, including ensuring that properly calibrated equipment was used and OQ's were acceptable?)
- Other (please comment)
- Was the inspection of adequate length to properly perform the inspection?

### Evaluator Notes:

Inspectors were at various stages of the inspection while PHMSA was on-site. The PHMSA representative witnessed calibration record checks of gages and measuring devices, OQ evaluations, use of procedures, and fusion plate temperature checks.

- 4 From your observation did the inspector have adequate knowledge of the pipeline safety program and regulations? (Evaluator will document reasons if unacceptable) 2 2

Yes = 2 No = 0 Needs Improvement = 1

### Evaluator Notes:

Inspector were at various ranges of experience but all had knowledge of pipeline systems and regulation. Inspectors asked good questions and used follow up questions well. They were familiar with procedures and had a good understanding of the extent of each project.

- 5 Did the inspector conduct an exit interview, including identifying probable violations? (If inspection is not totally completed the interview should be based on areas covered during time of field evaluation) 1 1

Yes = 1 No = 0 Needs Improvement = .5

### Evaluator Notes:

Neither visits was conducted at the end of the project so no exit interview was witnessed. Conversations with all three

inspections confirmed that an exit interview is part of the inspection process. No violations were found during either visit while PHMSA was at the site.

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**6** Was inspection performed in a safe, positive, and constructive manner ? Info Only Info Only

Info Only = No Points

- a. No unsafe acts should be performed during inspection by the state inspector
- b. What did the inspector observe in the field? (Narrative description of field observations and how inspector performed)
- c. Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices)
- d. Other

Evaluator Notes:

All inspectors conducted themselves in a safe manner, A safety briefing was conducted during the first inspection.(The other inspections had already started). All inspectors wore appropriate PPE. Observations are covered in a previous question.

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**7** General Comments: Info Only Info Only

Info Only = No Points

Evaluator Notes:

Inspectors at various levels of experience were observed. Inspectors had a good understanding of the project they were working on. They were prepared , asked good questions and asked good follow up questions. They checked required documentation and were professional in dealing with the operator.

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Total points scored for this section: 15  
Total possible points for this section: 15



## PART F - Damage prevention and Annual report analysis

Points(MAX) Score

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|---|--|---|---|
| 1 | Has the state reviewed Operator Annual reports, along with Incident/Accident reports, for accuracy and analyzed data for trends and operator issues.<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

An annual report review task is developed and tracked in Sales Force. Accuracy and trending is done during these reviews. The information from the audit is used in risk ranking. Incident reporting information is also trended. Damage prevention audits are done. A specialized form is used for the damage prevention audits.

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|---|--|---|---|
| 2 | Has the state verified that the operators analyze excavation damages for the purpose of determining root causes and minimizing the possibility of a recurrence? (192.617)<br>Has the state verified that the operators have appropriately identified excavators who have repeatedly violated one-call laws and damaged their facilities. Have the operators taken steps to mitigate that risks? (192.1007)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Operator analysis of excavation damage is evaluated during the damage prevention audit. This issue is also addressed in the incident checklist.

- |   |   |   |   |
|---|---|---|---|
| 3 | Has the state reviewed the operator's annual report pertaining to Part D - Excavation Damage?<br>Yes = 4 No = 0 Needs Improvement = 1-3 <ol style="list-style-type: none"><li>a. Is the information complete and accurate with root cause numbers?</li><li>b. Has the state evaluated the causes for the damages listed under "One-Call Notification Practices Not Sufficient" (Part D.1.a)?</li><li>c. Has the state evaluated the causes for the damages listed under "Locating Practices Not Sufficient" (Part D.1.b)? For each operator, does the state review the following?</li><li>d. Is the operator or its locating contractor(s) qualified and following written procedures for locating and marking facilities?</li><li>e. Is the operator appropriately requalifying locators to address performance deficiencies?</li><li>f. What is the number of damages resulting from mismarks?</li><li>g. What is the number of damages resulting from not locating within time requirements (no-shows)?</li><li>h. Is the operator appropriately addressing discovered mapping errors resulting in excavation damages?</li><li>i. Are mapping corrections timely and according to written procedures?</li><li>j. Has the state evaluated the causes for the damages listed under "Excavation Practices Not Sufficient" (Part D.1.c)?</li></ol> | 4 | 4 |
|---|---|---|---|

Evaluator Notes:

Excavation annual report review is done during the damage prevention audit. Data is also generated in Quarterly damage prevention reporting. The report provides detailed causal analysis.

- |   |   |   |   |
|---|---|---|---|
| 4 | Has the agency or another organization within the state collected data and evaluated trends on the number of pipeline damages per 1,000 locate requests?<br>Yes = 2 No = 0 Needs Improvement = 1 <ol style="list-style-type: none"><li>a. What stakeholder group is causing the highest number of damages to the pipelines? Operator, contractor, locating company or public.</li><li>b. Has the state verified the operator is appropriately focusing damage prevention education and training to stakeholders causing the most damages?</li><li>c. Has the state evaluated which of the following best describes the reason for the excavation damages; i.e., operator or contractor not following written procedures, failure to maintain marks, failure to support exposed facilities, failure to use hand tools were required, failure to test-hole (pot hole), improper backfilling practices, failure to maintain clearance or insufficient excavation practices.</li><li>d. Has the state verified the operator is appropriately focusing damage prevention education and training to address the causes of excavation damages?</li></ol> | 2 | 2 |
|---|---|---|---|

Evaluator Notes:

Data is evaluated during the damage prevention review.

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**5** General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

Damage preventions regulatory activities is managed through the damage preventions audit and through incident reporting data.

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Total points scored for this section: 10  
Total possible points for this section: 10



## PART G - Interstate Agent/Agreement States

Points(MAX) Score

- 1 Were all inspections of interstate pipelines conducted using the Inspection Assistant program for documenting inspections? Info Only Info Only  
Info Only = No Points

Evaluator Notes:

IA is used for all inspection work. Central Regional Office reports positive performance with no negative issues identified.

- 2 If inspections were conducted independent of a PHMSA team inspection was notice of all identified probable violations provided to PHMSA within 60 days? Info Only Info Only  
Info Only = No Points

Evaluator Notes:

Guidelines state that PHMSA is to be notified within 60 days of the determination. No reports of any problems has been identified by Central Regional Office.

- 3 If inspections were conducted independent of a PHMSA team inspection was PHMSA immediately notified of conditions which may pose an immediate safety hazard to the public or environment? Info Only Info Only  
Info Only = No Points

Evaluator Notes:

The requirement to notify PHMSA immediately if there is an issue that may pose an immediate threat to public or environment is identified in state guidelines. The guidelines are forwarded to all state inspectors. No such situation occurred in 2020.

- 4 If inspections were conducted independent of a PHMSA team inspection did the state coordinate with PHMSA if inspections not were not included in the PHMSA Inspection Work Plan? Info Only Info Only  
Info Only = No Points

Evaluator Notes:

Central regional office does not report any problems with the State coordinating activities with the Region.

- 5 Did the state take direction from and cooperate with PHMSA for all incident investigations conducted on interstate pipelines? Info Only Info Only  
Info Only = No Points

Evaluator Notes:

No interstate incidents occurred in 2020.

- 6 General Comments: Info Only Info Only  
Info Only = No Points

Evaluator Notes:

State program staff contacted Central Regional Office about Minnesota's pipeline safety work in 2020. Central Region had not negative issues to report.

Total points scored for this section: 0  
Total possible points for this section: 0