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

Oklahoma Corporation Commission

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: Oklahoma
Rating:
Agency Status:
60105(a): Yes **60106(a):** No **Interstate Agent:** No
Date of Visit: 08/17/2021 - 08/24/2021
Agency Representative: Dennis Fothergill, Kelly Phelps, John Harper
PHMSA Representative: Joe Subsits
Commission Chairman to whom follow up letter is to be sent:

Name/Title: Dana Murphy, Chairman
Agency: Oklahoma Corporation Commission
Address: PO Box 52000
City/State/Zip: Oklahoma City, OK 73152-2000

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		Possible Points	Points Scored
A	Progress Report and Program Documentation Review	0	0
B	Program Inspection Procedures	15	15
C	State Qualifications	10	10
D	Program Performance	50	50
E	Field Inspections	15	15
F	Damage prevention and Annual report analysis	10	10
G	Interstate Agent/Agreement States	0	0
TOTALS		**100**	**100**
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 = 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*	Info Only	Info Only

Evaluator Notes:

Progress report items were reviewed and found to be consistent with Commission records. Most data from the progress report comes from the PIPES data base which is designed to produce the progress report.

a.)Oklahoma lists 262 gas operators. There are 20 Local Distribution Companies, 54 municipal systems, 88 master meters, 59 transmission systems and 41 gathering lines. No issues found.

b.)No Issues found

c.) Consistent with attachment 1 and PIPES data base. No issues were found.

d.) There were 5 reportable gas incidents in 2020. This is consistent with data Mart. No Issues found.

e.) Compliance actions balance out. No Issues found.

f.) Files stored electronically in PIPES. A paper backup is also maintained. No issues found.

g.) Two new inspectors were hired in 2020. No issues found.

h.) 2020 amendments have been adopted. 2021 will be first year for automatic adoption. No issues found.

i.) No issues found

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 Yes = 5 No = 0 Needs Improvement = 1-4 a. Standard Inspections, which include Drug/Alcohol, CRM and Public Awareness Effectiveness Inspections b. TIMP and DIMP Inspections (reviewing largest operator(s) plans annually) c. OQ Inspections d. Damage Prevention Inspections e. On-Site Operator Training f. Construction Inspections (annual efforts) g. LNG Inspections	5	5

Evaluator Notes:
Pre and post inspection procedures are found on page 5 and 6.
a.) Standard inspections are addressed on page 4.
b.)Transmission Integrity Management Program (TIMP) and Distribution Integrity Management Program (DIMP) inspections are found on page 5.
c.) Operator Qualification inspections are found on page 4.
d.) Damage Prevention inspections are addressed on page 5
e.) On-site operator training is found on page 13 of the procedure.
f.) Construction inspections are found on page 4.
g.) There is no Liquified Natural Gas (LNG) in Oklahoma.
No issues found

		Points(MAX)	Score
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 Yes = 4 No = 0 Needs Improvement = 1-3 a. Length of time since last inspection b. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities) c. Type of activity being undertaken by operators (i.e. construction) d. Locations of operator's inspection units being inspected - (HCA's, Geographic area, Population Centers, etc.) 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) f. Are inspection units broken down appropriately?	4	4

Evaluator Notes:
Risk information is currently entered into a spreadsheet. The Commission is currently looking into a different risk prioritization process. An example of an assessment done by another state was presented for the Commissions consideration.
No issues found.

		Points(MAX)	Score
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 Yes = 3 No = 0 Needs Improvement = 1-2 a. Procedures to notify an operator (company officer) when a noncompliance is identified b. Procedures to routinely review progress of compliance actions to prevent delays or breakdowns c. Procedures regarding closing outstanding probable violations	3	3

Evaluator Notes:
a.) Procedures to notify operators of probable violations are found on page 12 of the procedures.
b.) Procedures covering compliance follow up are found on pages 12 - 13. Operators are required to review the previous inspection results and compliance status prior to conducting an inspection.
c.) Closure procedures are addressed on page 13. A close out letter is sent after an inspection with no findings. Verbal

closure are documented in the inspection record.
No issues found

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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? 3 3

Yes = 3 No = 0 Needs Improvement = 1-2

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:

Incident investigations are addressed on page 4 and 11. An engineer is on call. Inspectors are located throughout the state and have assigned areas. Incident are assigned to the engineer who is responsible for an area. All federally reportable incident are investigated. No issues found.

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5 General Comments: Info Only Info Only

Info Only = No Points

Evaluator Notes:

Procedures are condensed but addressed key elements required by state guidelines. No issues found.

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

PART C - State Qualifications

		Points(MAX)	Score
1	Has each inspector and program manager fulfilled training requirements? (See Guidelines Appendix C for requirements) Chapter 4.4 Yes = 5 No = 0 Needs Improvement = 1-4 a. Completion of Required OQ Training before conducting inspection as lead b. Completion of Required DIMP/IMP Training before conducting inspection as lead c. Completion of Required LNG Training before conducting inspection as lead d. Root Cause Training by at least one inspector/program manager e. Note any outside training completed f. Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector (Reference State Guidelines Section 4.3.1)	5	5

Evaluator Notes:

Personnel training records are tracked using T&Q blackboard. New personnel are mentored and ride with experienced inspectors until they are trained.

a.) Inspectors qualified to conduct OQ training are Bruce Cambell, Vince Eitzen, John Harper, Chad Holiday, Randy Kirkegard, Rick Mathews, Dustin Merriman, Jeff Overbay, Mitchel Skinner, Ron Smith, Randy Snyder and Don Taxton

b.) Inspector that are IMP qualified are Steven Bibb, Bruce Cambell, Vince Eitzen, Dennis Fothergill, John Harper, Chad Holiday, Randy Kirkegard, Rick Mathews, Dustin Merriman, Jeff Overbay, Kelly Phelps, Mitchel Skinner, Ron Smith, Randy Snyder and Don Taxton.

c.) There is no LNG in Oklahoma

d.) Root cause training has been taken by Bruce Cambell, Vince Eitzen, John Harper, Chad Holiday, Randy Kirkegard, Rick Mathews, Dustin Merriman, Jeff Overbay, Mitchel Skinner, Ron Smith, Randy Snyder and Don Taxton

e.) No outside training was noted

f.) The following inspectors completed their core classes: Steven Bibb, Bruce Cambell, Vince Eitzen, Dennis Fothergill, John Harper, Chad Holiday, Randy Kirkegard, Rick Mathews, Dustin Merriman, Jeff Overbay, Kelly Phelps, Mitchel Skinner, Ron Smith, Randy Snyder and Don Taxton

All inspectors were qualified except for Chance Nestil, Mike Bales, Brandon Lee and Billy Anglin who are new hires. No issues were noted.

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 Yes = 5 No = 0 Needs Improvement = 1-4	5	5

Evaluator Notes:

Dennis Fothergill is qualified to do the core inspection work. He has been the with the pipeline safety program for 34 years. He has a good understanding of pipeline safety issues. No issues were noted.

3	General Comments: Info Only = No Points	Info Only	Info Only

Evaluator Notes:

Most Staff were fully qualified in accordance with T&Q criteria. There were four new inspectors which were being mentored by experienced staff. Program manager Dennis Fothergill has been with the pipeline safety program for 34 years.

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

PART D - Program Performance

		Points(MAX)	Score
1	Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1 Yes = 5 No = 0 Needs Improvement = 1-4 a. Standard (General Code Compliance) b. Public Awareness Effectiveness Reviews c. Drug and Alcohol d. Control Room Management e. Part 193 LNG Inspections f. Construction (did state achieve 20% of total inspection person-days?) g. OQ (see Question 3 for additional requirements) h. IMP/DIMP (see Question 4 for additional requirements)	5	5

Evaluator Notes:

20% of the states operators were randomly checked for recent and previous inspections interval.
a.) Standard inspections are typically performed annually. This was validated during the review
b.) Most public awareness inspections were conducted every three years. Frequencies for a couple operators exceeded three years but did not exceed five years.
c.) Drug alcohol inspections were conducted in conjunction with standard inspections. The state was informed that they need to start using the new drug and alcohol form for upcoming inspections.
d.) Control Management inspections were last conducted in 2019 for the applicable operators.
e.) There is no LNG operators in Oklahoma
f.) The Commission stated they had 313 construction day which is 22% of their field days.
g.) Most Operator Qualification Inspections were conducted within 3 three years. A few inspections were over three years but did not exceed five years.
h.) Most IMP/ DiMP inspection were conducted within four years. No inspections exceeded five years.
No issues were found

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? Yes = 10 No = 0 Needs Improvement = 1-9 a. Standard (General Code Compliance) b. Public Awareness Effectiveness Reviews c. Drug and Alcohol d. Control Room Management e. Part 193 LNG Inspections f. Construction g. OQ (see Question 3 for additional requirements) h. IMP/DIMP (see Question 4 for additional requirements)	10	10

Evaluator Notes:

a-f) Oklahoma uses PHMSA written forms. They are looking to transition towards using IA.
e) There is no LNG in Oklahoma
No issues found.

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 Yes = 2 No = 0 Needs Improvement = 1	2	2

Evaluator Notes:

Operator qualification programmatic inspections are done every five years. Protocol 9 is looked at during every standard inspection. No issues found.

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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 — 2 — 2

Yes = 2 No = 0 Needs Improvement = 1

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?

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?

c. Are the states verifying operators are including low pressure distribution systems in their threat analysis?

Evaluator Notes:

a.)largest operators are inspected annually.

b.)Oklahoma uses written DIMP form

c.)Oklahoma uses written DIMP form

No issues found

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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 — 2 — 2

Yes = 2 No = 0 Needs Improvement = 1

a. Operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken;

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);

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;

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;

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;

f. Operator procedures for considering low pressure distribution systems in threat analysis?

g. Operator compliance with state and federal regulations for regulators located inside buildings?

Evaluator Notes:

a.)There is no cast iron In Oklahoma

b.)There is no cast iron in Oklahoma

c.)Oklahoma sends letter email notices to operators. Emails require a response from the operator on how they will address the issue. Commission follows up with a letter if the operator did not respond to the email.

d.) Oklahoma sends letter email notices to operators. Emails require a response from the operator on how they will address the issue. Commission follows up with a letter if the operator did not respond to the email.

e.) This issue is addressed in PHMSA's checklist.

f.)Oklahoma sends letter email notices to operators. Emails require a response from the operator on how they will address the issue. Commission follows up with a letter if the operator did not respond to the email.

g.) There are no indoor meter sets in Oklahoma

No issues found

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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) — 1 — 1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Oklahoma sends letter email notices to operators. Emails require a response from the operator on how they will address the issue. Commission follows up with a letter if the operator did not respond to the email. No issues determined.

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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 — 10 — 10

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

a. Were compliance actions sent to company officer or manager/board member if municipal/government system?

b. Were probable violations documented properly?

c. Resolve probable violations

d. Routinely review progress of probable violations

e. Did state issue compliance actions for all probable violations discovered?

f. Can state demonstrate fining authority for pipeline safety violations?

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)

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:

Compliance documentation was evaluated during the inspection review process. Documentation , responses and follow up were performed in a timely manner. Issues were properly resolved and none resulted in accelerated enforcement. Compliance actions are reviewed by Dennis and either Kelly or John. Inspectors also review responses and make recommendation to the mangers. Though there were no fines in 2020, there has been historical evidence of the state issuing monetary penalties. No issues found.

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8 (Incident Investigations) Were all federally reportable incidents investigated, thoroughly documented, with conclusions and recommendations? — 10 — 10

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

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:

Oklahoma assigns an inspector to serve 24 hour on-call duty to receive pipeline incident notifications. The on-call engineer notifies the regional engineer assigned a particular area if there is a need to go on-site. All Federally reportable incidents are investigated. There were five federally reportable incidents in 2020. All five incidents were investigated . The Commission used PHMSA's form 11 to document federally reportable incidents. The Commission evaluates the incident for cause and compliance with 49 CFR 192. The review included the inspection report, compliance letter, operator response and closure documentation. All violations were addressed by the operators and the Commission accepted the operators response and closed out the compliance actions in the proper manner. No issues found.

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9 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 — 1 — 1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

A letter went out to Todd Hiett on 11/10/2020. This letter did not require a response. No issues found.

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10 Did State conduct or participate in pipeline safety training session or seminar in Past 3 Years? Chapter 8.5 — Info Only — Info Only

Info Only = No Points

Evaluator Notes:

The last Commission seminar was conducted on November 2018. A Seminar is scheduled for this year. No issues found.

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11 Has state confirmed transmission operators have submitted information into NPMS database along with changes made after original submission? — Info Only — Info Only

Info Only = No Points

Evaluator Notes:

The NPMS update issue is addressed in the transmission checklist. John Harper also tracks this activity on a spreadsheet. John call Washington DC to confirm that the notifications have been made. No issues found.

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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:

The Commission communicates with stakeholders through the web page. They also communicate through mailings and e-mail. No issues found.

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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 gas safety related condition in 2020. This was general corrosion of the Enable Oklahoma Transmission System. This activity was closed out in WMS by the Oklahoma Commission. No issues found.

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14 Was the State responsive: — 1 — 1

Yes = 1 No = 0 Needs Improvement = .5

a. Surveys or information requests from NAPSR or PHMSA; and

b. PHMSA Work Management system tasks?

Evaluator Notes:

The Commission responds to NAPSR surveys. Typically Dennis seeks input from field personnel prior to filling out the survey monkey. John Harper periodically checks IMP notifications. No issues found.

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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:

Oklahoma does not have any active waivers in the state. No issues found.

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16 Were pipeline program files well-organized and accessible? — Info Only — Info Only

Info Only = No Points

Evaluator Notes:

Oklahoma had electronic files and color coded hard copy files as backup. No issues found.

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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:

SiCT days are 1263 days for 2020. Actual field days in 2020 is 1369. There were 313 construction days reported which represents 22% of the inspection days. No issues found.

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18 Discussion on State Program Performance Metrics found on Stakeholder Communication site.\ http://primis.phmsa.dot.gov/comm/states.htm?nocache=4805 — Info Only — Info Only

Info Only = No Points

Evaluator Notes:

Excavation damage appeared to be trending downward. Inspection days were trending up. Master meter inspections and Propane system inspections were trending down. Amount of gas inspectors was trending up. There was a slight decrease in leaks Enforcement and investigation evaluation score are steady at the top level. No issues found.

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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:

Safety Management Systems are promoted in conjunction with the Commission's advisory bulletin letters. No issues found.

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20 General Comments: — Info Only — Info Only

Info Only = No Points

Evaluator Notes:

No issues were found in Part D.

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 = No Points a. What type of inspection(s) did the state inspector conduct during the field portion of the state evaluation? (i.e. Standard, Construction, IMP, etc) b. When was the unit inspected last? c. Was pipeline operator or representative present during inspection? d. Effort should be made to observe newest state inspector with least experience	Info Only	Info Only

Evaluator Notes:

a.) The field portion of a standard records and field review for Oklahoma Natural Gas Transmission inspection was evaluated.
b.) Oklahoma standard inspections are conducted annually. The unit was last inspected in 2019.
c.) Compliance representatives from Oklahoma Natural Gas were present at the inspection.
d.) The Oklahoma Corporation Commission representatives were Chad Holiday and Chance Nestil. Chad has been an inspector for 6 years. Chance is currently being mentored by more senior inspectors.

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) Yes = 2 No = 0 Needs Improvement = 1	2	2

Evaluator Notes:

Oklahoma Corporation Commission uses PHMSA hard copy forms to document inspection work. Field notes are transposed onto the PHMSA form.

3	Did the inspector adequately review the following during the inspection Yes = 10 No = 0 Needs Improvement = 1-9 a. Procedures (were the inspector's questions of the operator adequate to determine compliance?) b. Records (did the inspector adequately review trends and ask in-depth questions?) c. Field Activities/Facilities (did inspector ensure that procedures were being followed, including ensuring that properly calibrated equipment was used and OQ's were acceptable?) d. Other (please comment) e. Was the inspection of adequate length to properly perform the inspection?	10	10

Evaluator Notes:

a.) Chad was knowledgeable of pressure control processes and company procedures. He had made reference to procedures during the inspection.
b.) Records review was not part of the field review
c.) Chad had Oklahoma Natural Gas personnel take pipe to soil readings and had them test relief valves. He Checked gage calibration dates and checked for atmospheric corrosion.
d.) No issues found
e.)We only inspected Chad one day. This represented only a portion of his inspection.
No issues found

4	From your observation did the inspector have adequate knowledge of the pipeline safety program and regulations? (Evaluator will document reasons if unacceptable) Yes = 2 No = 0 Needs Improvement = 1	2	2

Evaluator Notes:

Chad was knowledgeable of the operator program and federal regulations. He asked appropriate follow up questions. He had taken the required T&Q training. No issues found.

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) Yes = 1 No = 0 Needs Improvement = .5	1	1

Evaluator Notes:

The inspection was not completed. Chad stated the he does exit interviews at the end of his inspection. No issues noted.

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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:

Chad performed the inspection in a safe manner. He wore the appropriate PPE. He asked for appropriate tests and measurements. No issues found.

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7 General Comments: Info Only Info Only

Info Only = No Points

Evaluator Notes:

Chad was knowledgeable of pipeline operations and regulation. He asked good follow up questions. He built good rapport with the operator. No issues found.

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

Evaluator Notes:
Annual reports are reviewed by John and Kelly. Spreadsheets are used to track information for accuracy and trending. Information from this review are used to populate the Commission risk assessment. No Issues found.

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) 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) Yes = 2 No = 0 Needs Improvement = 1	2	2

Evaluator Notes:
Operators are required to submit a semi annual report which includes damage prevention information. This is required in Oklahoma regulation. This is a new process and is evolving.

3	Has the state reviewed the operator's annual report pertaining to Part D - Excavation Damage? Yes = 4 No = 0 Needs Improvement = 1-3 a. Is the information complete and accurate with root cause numbers? b. Has the state evaluated the causes for the damages listed under "One-Call Notification Practices Not Sufficient" (Part D.1.a.)? 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? d. Is the operator or its locating contractor(s) qualified and following written procedures for locating and marking facilities? e. Is the operator appropriately requalifying locators to address performance deficiencies? f. What is the number of damages resulting from mismarks? g. What is the number of damages resulting from not locating within time requirements (no-shows)? h. Is the operator appropriately addressing discovered mapping errors resulting in excavation damages? i. Are mapping corrections timely and according to written procedures? j. Has the state evaluated the causes for the damages listed under "Excavation Practices Not Sufficient" (Part D.1.c.)?	4	4

Evaluator Notes:
Reports are received semi annually. Information is consistent with annual reporting requirements. Causal factors are reviewed by Commission personnel to determine causal factors.

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? Yes = 2 No = 0 Needs Improvement = 1 a. What stakeholder group is causing the highest number of damages to the pipelines? Operator, contractor, locating company or public. b. Has the state verified the operator is appropriately focusing damage prevention education and training to stakeholders causing the most damages? 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. d. Has the state verified the operator is appropriately focusing damage prevention education and training to address the causes of excavation damages?	2	2

Evaluator Notes:

Information is evaluated by Commission personnel semi-annually. Causal information is analyzed . Issues are addressed with the operator.

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5 General Comments: Info Only Info Only

Info Only = No Points

Evaluator Notes:

No issues found

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 = No Points	Info Only	Info Only

Evaluator Notes:
The Oklahoma Corporation Commission is not an interstate agent and does not have a 60106 agreement with PHMSA.

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 = No Points	Info Only	Info Only

Evaluator Notes:
The Oklahoma Corporation Commission is not an interstate agent and does not have a 60106 agreement with PHMSA.

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 = No Points	Info Only	Info Only

Evaluator Notes:
The Oklahoma Corporation Commission is not an interstate agent and does not have a 60106 agreement with PHMSA.

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 = No Points	Info Only	Info Only

Evaluator Notes:
The Oklahoma Corporation Commission is not an interstate agent and does not have a 60106 agreement with PHMSA.

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

Evaluator Notes:
The Oklahoma Corporation Commission is not an interstate agent and does not have a 60106 agreement with PHMSA.

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

Evaluator Notes:
The Oklahoma Corporation Commission is not an interstate agent and does not have a 60106 agreement with PHMSA.

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