

**PHMSA UNDERGROUND NATURAL GAS STORAGE (UNGS)**  
**Oregon PUC PROGRAM EVALUATION – CY2020**  
**CONDUCTED 9/20-22/2021**

<b>A – PROGRESS REPORT AND PROGRAM DOCUMENTATION REVIEW</b>	<b>9 of 9</b>
<b>B – PROGRAM INSPECTION PROCEDURES</b>	<b>14 of 14</b>
<b>C – PROGRAM PERFORMANCE</b>	<b>29 of 29 (34)</b>
<b>D – COMPLIANCE ACTIVITIES</b>	<b>13 of 13 (21)</b>
<b>E – INCIDENT INVESTIGATIONS</b>	<b>6 of 6 (13)</b>
<b>F – DAMAGE PREVENTION</b>	<b>4 of 4</b>
<b>G – FIELD INSPECTIONS</b>	<b>NC (12)</b>
<b>H - 60106 AGREEMENT STATE (if applicable)</b>	<b>NA (6)</b>
<b>TOTAL PROGRAM EVALUATION POINTS</b>	<b>75 OF 75 (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	Accuracy of Jurisdictional Authority and Operator/Inspection Units Data – Progress Report Attachment 1 (Yes= 1 point, No= 0 Points, NI=.5 point) <b>Comments: Yes. Attachment 1 agrees with Attachments 3 &amp; 8 and is consistent with Program records.</b>	1
2	Review of Inspection Days for accuracy – Progress Report Attachment 2 (Yes= 1 point, No= 0 Points, NI=.5 point) <b>Comments: Yes. Attachment 2 agrees with OR PUC records.</b>	1
3	Accuracy verification of Operators and Operators Inspection Units in State – Progress Report Attachment 3 (Yes= 1 point, No= 0 Points, NI=.5 point) <b>Comments: Yes. Attachment 3 agrees with OR PUC records.</b>	1
4	Accuracy verification of Compliance Activities – Progress Report Attachment 5 (Yes= 1 point, No= 0 Points, NI=.5 point) <b>Comments: Yes. Attachment 5 agrees with OR PUC records.</b>	1
5	Were UNGS program files well-organized and accessible? - Progress Report Attachment 6 (Yes= 2 points, No= 0 Points, NI=1 point) <b>Comments: Yes. All records are electronic and easily accessed.</b>	2
6	Was employee listing and completed training accurate and complete? – Progress Report Attachment 7 (Yes= 1 point, No= 0 Points, NI=.5 point) <b>Comments: Yes. Kevin &amp; 2 inspectors, Ray Muller and John Ivey, have taken the UNGS course at TQ and the rest are scheduled for the class. Note-Ray &amp; John left for other employment in 2021.</b>	1
7	Verification of Part 192 and 199 Rules and Amendments – Progress Report Attachment 8 (Yes= 1 point, No= 0 Points) <b>Comments: Yes. The 3 items pending on 12/31 that are now adopted. All items are now adopted. 2020 was the 2<sup>nd</sup> year of the UNGS partnership.</b>	1
8	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) <b>Comments: Yes. Attachment 10 was filled out. Discussed that work applicable to UNGS was also applicable to Gas PL and was charged as Gas PL work.</b>	1
9	<b>General Comments: Ms. Megan Decker, Chair, Oregon Public Utility Commission, PO Box 1088, Salem, OR 97308-1088. Kevin Hennessy, Prog Mngr; Patrick Gaume, Evaluator; UNGS PROGRESS REPORT REVIEW score is 50 of 50: No incidents were reported in UNGS for 2019. Part A scored 9 of 9 points.</b>	9

<p align="center"><b>B – PROGRAM INSPECTION PROCEDURES</b></p> <p align="center">Does State Inspection Plan include procedures that address the following elements? (See Guidelines Section 5.1)</p>		
1	<p>Does State have written inspection procedures? (Yes= 2 points, No= 0 Points, NI=1 point)</p> <p><b>Comments: Yes. UNGS has been included into the Pipeline Procedures.</b></p>	2
2	<p>Standard Inspections</p> <p>Do Standard Inspection procedures give guidance to State inspectors that insure consistency for inspections conducted by the State? The following elements should be addressed at a minimum. (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> <li>• Post Inspection Activities</li> </ul> <p>(Yes= 2 points, No= 0 Points, NI=1 point)</p> <p><b>Comments: Yes. See Part V ‘Conducting Inspections’; Sections B through O of the procedures. They provide general and specific guidance.</b></p>	2
3	<p>Integrity Management Inspections</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> <li>• Post Inspection Activities</li> </ul> <p>(Yes= 2 points, No= 0 Points, NI=1 point)</p> <p><b>Comments: Yes. See Part V ‘Conducting Inspections’; Sections B through O of the procedures. They provide general and specific guidance.</b></p>	2
4	<p>Design, Testing, and Construction Inspections</p> <p>Do Design, Testing, and Construction Inspection procedures give guidance to State inspectors that insure consistency for Inspections conducted by the State? The following elements should be addressed at a minimum. (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)</p> <p><b>Comments: Yes. See Part V ‘Conducting Inspections’; Sections B through O of the procedures. They provide general and specific guidance.</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: Yes. OR PUC uses the UNGS Standard Inspection to address all Field inspection items. See Part V ‘Conducting Inspections’; Sections B through O of the procedures. They provide general and specific guidance.</b></p>	1
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 Part V ‘Conducting Inspections’; Sections B through O of the procedures. They provide general and specific guidance.</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 B of the Procedures. Is used informally as OR has only 1 UNGS operator and only 3 Gas operators and they are seen every year for one inspection or another.</b></p>	5
8	<p><b>General Comments: Part B scored 14 of 14 points.</b></p>	14

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. Attachment 7 agrees with the year-end-payment request and will show no inspector and no Field time for 2020. 0/0=indeterminate. Points awarded.</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. Kevin &amp; 2 inspectors, Ray Muller and John Ivey, have taken the UNGS course at TQ and the rest are scheduled for the class. Note-Ray &amp; John left for other employment in 2021. 2020 is the 2<sup>nd</sup> year of the UNGS Partnership.</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: OR is using IA for all inspections.</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. Kevin is knowledgeable of PHMSA Programs and Procedures</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: Yes. November 3 &amp; December 22 for the letter and response is within the 60-day requirement.</b></p>	2
6	<p>Did State inspect all types of operators and inspection units in accordance with time intervals established in their written procedures? Chapter 5.1          (Yes= 5 points, No= 0 Points, NI=1-4 points)  <b>Comments: Yes. 2<sup>nd</sup> year of the UNGS Program. Discussed the conditions that resulted in zero UNGS Standard Inspections during the UNGS Partnership, (2019 &amp; 2020).</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. IA is used.</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: NA. No inspections were performed for UNGS.</b></p>	NA
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. Annual reports are collected and reviewed. No incidents for UNGS.</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. A D&amp;A inspection was performed in 2020 on the UNGS operator. This question was addressed.</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:</b>  <b>Yes. By website; <a href="https://www.oregon.gov/PUC/Pages/default.aspx">https://www.oregon.gov/PUC/Pages/default.aspx</a> ; and for contact information; <a href="https://www.oregon.gov/puc/about-us/Pages/Contact-Us.aspx">https://www.oregon.gov/puc/about-us/Pages/Contact-Us.aspx</a> .</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 SRC for UNGS</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. Response is made to all requests/inquires.</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. none for UNGS.</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. none for UNGS.</b></p>	NA
16	<p><b>General Comments: Part C scored 29 of 29 points. Questions 8, 12, 14, &amp; 15 were NA.</b></p>	34

D – COMPLIANCE ACTIVITIES		
1	<p>Does the State have written procedures to identify steps to be taken from the discovery to resolution of a probable violation? Chapter 5.1</p> <ul style="list-style-type: none"> <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:</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: Yes. See Part V 'Conducting Inspections'; Section Q of the procedures.</b></p>	4
3	<p>Did State within 30 days of the end of an inspection conduct a post-inspection briefing with the owner or operator of the UNGS facility inspected outlining any concerns identified during the inspection?</p> <p>(Yes= 2 points, No= 0 Points, NI=1 point)  <b>Comments: NA. no UNGS inspections were performed. Procedures are in place.</b></p>	NA
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: NA. no UNGS inspections were performed. Procedures are in place.</b></p>	NA
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: NA. no UNGS inspections were performed. Procedures are in place.</b></p>	NA
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: NA. no UNGS inspections were performed. Procedures are in place.</b></p>	NA

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. Kevin is familiar with the process. Last civil penalty was in 2013.</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: Yes, the record of a 2013 OQ Violation was shown and showed a \$40K civil penalty.</b></p>	2
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, the record of a 2013 OQ Violation was shown and showed a \$40K civil penalty.</b></p>	1
10	<p><b>General Comments: Part D scored 13 of 13 points. Questions 3-6 were NA.</b></p>	21



E – INCIDENT INVESTIGATIONS		
1	<p>Does the State have written procedures to address State actions in the event of an incident? (Yes= 2 points, No= 0 Points, NI=1 point)</p> <p><b>Comments: Yes. See Part VI ‘Investigation of Incidents’ in the procedures.</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. 24/7 phone no: 503-378-6965, Pipeline inspectors rotate being on duty with the phone. State also accesses the NRC reports.</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: NA. No UNGS incidents have occurred. Procedures are in place.</b></p>	NA
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 UNGS incidents have occurred. Procedures are in place.</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. No UNGS incidents have occurred. Procedures are in place.</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. No UNGS incidents have occurred. Procedures are in place.</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: Okay, OPUC is ready to do so; no such requests were made in 2020.</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. Practice is to share Lessons Learned during the Regional NAPSIR Meeting.</b></p>	1

9	General Comments: Part E scored 6 of 6 points. Questions 3,4,5, & 6 were NA.	13
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F – DAMAGE PREVENTION		
1	<p>Did the State inspector verify UNGS operators are following their written procedures pertaining to notification of excavation, marking, positive response and the availability and use of the one call system? (API 1171 Section 11.10 Public Awareness and Damage Prevention) (Yes= 2 points, No= 0 Points, NI=1 Point)</p> <p><b>Comments: Yes. Generally addressed during the HQ inspections. UNGS is considered along with the rest of the Pipeline facilities.</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. OPUC is a partner in the Oregon Utility Notification Center (OUNC). OPUC sponsors the OR Utility Safety Council (OUSC) with bi-monthly meetings including all operators.</b></p>	2
3	<p><b>General Comments: Part F scored 4 of 4 points.</b></p>	4

G – FIELD INSPECTIONS		
1	Operator, Inspector, Location, Date and PHMSA Representative <b>Comments: OR PUC UNGS program has not performed an UNGS inspection during the two years of the partnership; due to COVID in 2019, and due to lack of available personnel in 2020. An inspection has been set up during 2021 but it is now likely that it will not be performed.</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: NC. No inspection performed.</b>	NC
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: NC. No inspection performed.</b>	NC
4	Did the inspector thoroughly document results of the inspection? (Yes= 2 points, No= 0 Points, NI=1 Point) <b>Comments: NC. No inspection performed.</b>	NC
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: NC. No inspection performed.</b>	NC
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: NC. No inspection performed.</b>	NC
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: NC. No inspection performed.</b>	NC
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: NC. No inspection performed.</b>	NC

[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. Not a 60106 Partner.</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. Not a 60106 Partner.</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. Not a 60106 Partner.</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. Not a 60106 Partner.</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. Not a 60106 Partner.</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. Not a 60106 Partner.</b></p>	NA
7	<p><b>General Comments: NA. Not a 60106 Partner.</b></p>	NA