



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

Public Service Commission, State of Wyoming

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: Wyoming

Agency Status:

Date of Visit: 09/14/2021 - 09/16/2021

Agency Representative: David Piroutek, Engineering Supervisor

PHMSA Representative: David Lykken, PHMSA State Programs

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

Name/Title: Mr. Christopher Petrie, Chairman

Agency: Wyoming Public Service Commission

Address: 2515 Warren Avenue, Suite 300

City/State/Zip: Cheyenne, WY 82002

Rating:

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

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	48
15	15
10	10
0	0
100	98

TOTALS

State Rating **98.0**

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:

a & c: Inspection Unit totals by operator type on Attachment 3 are consistent with the Inspection Unit totals on Attachment 1.
b: Minimum number of inspection days required was 217. Actual was 224. DT&C days were 8.98% of SICT total minimum.
Operator construction activity reduced due to Covid restrictions. d: Reviewed PDM data. No issues. Compliance activity numbers match records kept by the program. Training verified through Blackboard.

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 | 5 | 5 |
| | <ul style="list-style-type: none">a. Standard Inspections, which include Drug/Alcohol, CRM and Public Awareness Effectiveness Inspectionsb. TIMP and DIMP Inspections (reviewing largest operator(s) plans annually)c. OQ Inspectionsd. Damage Prevention Inspectionse. On-Site Operator Trainingf. Construction Inspections (annual efforts)g. LNG Inspections | | |

Evaluator Notes:

No changes from prior year. a. Inspection Planning beginning on page 5, Pre-Inspection, Inspection and Post Inspection pages 5-7 and 10. b. Pre-Inspection, Inspection and Post Inspection pages 5-7 and 11. c. Pre-Inspection, Inspection and Post Inspection pages 5-7 and 11-12. d. Pre-Inspection, Inspection and Post Inspection pages 5-7 and 12. e. On-site operator training addressed on page 12. f. Pre-Inspection, Inspection and Post Inspection pages 5-7 and 12. g. LNG facilities records and field inspected annually. LNG procedures not to exceed every 3 years (page 4).

- | | | | |
|---|---|---|---|
| 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 | 4 | 4 |
| | <ul style="list-style-type: none">a. Length of time since last inspectionb. 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? | | |

Evaluator Notes:

No changes. Items a thru e covered on pages 3-5, and 11 of written procedures. Units apportioned appropriately.

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| 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 | 3 | 3 |
| | <ul style="list-style-type: none">a. Procedures to notify an operator (company officer) when a noncompliance is identifiedb. Procedures to routinely review progress of compliance actions to prevent delays or breakdownsc. Procedures regarding closing outstanding probable violations | | |

Evaluator Notes:

Same as prior year. a, b, and c. Page 8 of 13 (Post Inspection Activities/Facilities Inspection Report).

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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?
Yes = 3 No = 0 Needs Improvement = 1-2 | 3 | 3 |
| | <ul style="list-style-type: none">a. Mechanism to receive, record, and respond to operator reports of incidents, including after-hours reportsb. 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:

Same as last year. Section 3 (Specific Instructions for the Inspection of Gas Utilities and Intrastate Gas Pipeline Operators), Part g (Incident/Accident investigations). Each operator is to notify the gas pipeline safety section by telephone. If an incident occurs outside the commission's working hours, the operator contacts an employee of the gas pipeline safety section. The commission provides a list of pipeline staff and their telephone numbers to each operator. No reportable incidents in CY2020. Verified in PDM and WMS.

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

No point deduction under Part 'B'. No issues.

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
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
| | <ul style="list-style-type: none">a. Completion of Required OQ Training before conducting inspection as leadb. Completion of Required DIMP/IMP Training before conducting inspection as leadc. Completion of Required LNG Training before conducting inspection as leadd. Root Cause Training by at least one inspector/program managere. Note any outside training completedf. Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector (Reference State Guidelines Section 4.3.1) | | |

Evaluator Notes:

a. Yes. b. Yes. c. Piroutek and McCollom qualified to lead IM inspections d. PM has Root Cause training. E. Outside training - Wyoming and Rocky Mountrain Underground Corrosion Committee workshop in 2020. f. All now have required core training.

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

Evaluator Notes:

Yes. Mr. Piroutek has been with the safety program since 2001.

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| 3 | General Comments:
Info Only = No Points | Info Only | Info Only |
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Evaluator Notes:

No point deduction under Part "C".

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
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 3 |
| | <ul style="list-style-type: none">a. Standard (General Code Compliance)b. Public Awareness Effectiveness Reviewsc. Drug and Alcohold. Control Room Managemente. Part 193 LNG Inspectionsf. 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) | | |

Evaluator Notes:

A 2-point deduction for not completing all inspection types within the maximum five year intervals. D&A including Pinedale NG, Town of Walden, Wyoming Gas, Anadarko Petroleum. Refer to random operator list for full details. The program did not meet the 20% (8.98%) construction person-days primarily related to reduced operator construction activities due to Covid-19 restrictions and the redirection of inspection staff resources to focus on getting back up to speed on any missed operator/inspection type intervals.

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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?
Yes = 10 No = 0 Needs Improvement = 1-9 | 10 | 10 |
| | <ul style="list-style-type: none">a. Standard (General Code Compliance)b. Public Awareness Effectiveness Reviewsc. Drug and Alcohold. Control Room Managemente. Part 193 LNG Inspectionsf. Constructiong. OQ (see Question 3 for additional requirements)h. IMP/DIMP (see Question 4 for additional requirements) | | |

Evaluator Notes:

The program utilizes the IA for documenting inspection results including D&A inspections. The program has a separate inspection form for LPG inspections.

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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
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

Yes. 14 days devoted to OQ activities. OQ field validation typically done as part of standard inspections.

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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
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
| | <ul style="list-style-type: none">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:

Yes. 17.25 days devoted to IM activities. As noted during last year's evaluation Integrity Management Program inspections are conducted within two years of the notification of changes to an operator's Integrity Management Program.

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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
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
| | <ul style="list-style-type: none"> 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:

Same as prior year. a & b: No CI remaining in WY. C: Covered under Procedures/Emergency Group in IA. d: Question covered under IA Records/O&M group. e. Question covered in IA under O&M Procedures. f. No low pressure systems remaining in WY. G. Program in place to remove existing inside installations. Addressed also in IA GD question set.

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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)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

Yes. PHMSA Advisory Notices ADB-2020-01 (Inside Meters) and ADB-2020-02 (Low Pressure Systems). MDU and Black Hills Energy. Conversations with both. Last remaining low pressure removed in 2019. Black Hills has a program in place to relocate identified inside meter sets.

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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
Yes = 10 No = 0 Needs Improvement = 1-9 | 10 | 10 |
| | <ul style="list-style-type: none"> 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:

7 compliance letters sent out. All met 90 day requirement. Most within 60 days. BHE Laramie Co inspection conducted 2/10-14 and on 8/3-7/2020. No findings during Feb inspection. The program undersatnds that a written notice would need to have been provided to the operator if there were findings at that time. Enforcement manual currently in development for the pipeline program. Currently there are three compliants filed with the Commission.

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| 8 | <p>(Incident Investigations) Were all federally reportable incidents investigated, thoroughly documented, with conclusions and recommendations?</p> <p>Yes = 10 No = 0 Needs Improvement = 1-9</p> <ul style="list-style-type: none"> 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? | 10 | 10 |
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Evaluator Notes:

No reportable incidents in CY2020. Information is consistent with the incident report information contained in PDM. Each operator is to notify the gas pipeline safety section by telephone. If an incident occurs outside the commission's working hours, the operator contacts an employee of the gas pipeline safety section. The commission provides a list of pipeline staff and their telephone numbers to each operator.

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| 9 | <p>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</p> <p>Yes = 1 No = 0 Needs Improvement = .5</p> | 1 | 1 |
|---|--|---|---|

Evaluator Notes:

Yes. State Programs letter out via email on 9/24/20. Chairs response received on 10/20/20.

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| 10 | <p>Did State conduct or participate in pipeline safety training session or seminar in Past 3 Years? Chapter 8.5</p> <p>Info Only = No Points</p> | Info Only | Info Only |
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Evaluator Notes:

Last in 2017. One scheduled for CY2020 cancelled due to Covid-19 restrictions. A remote session was conducted in July 2021.

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

Bridger Lake, LLC (interstate) & Genesis Alkali LLC failed to submit or provided inaccurate NPMS data. PHMSA plans to take enforcement action. The program sends out annual email reminders to oporators.

- 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:

No change from prior year. Commission web site provides web links to PHMSA State Programs Overview page, Wyoming One-Call. Only enforcement cases brought to commission open meetings made available via public records request.

- 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:

No SRCR's submitted by operators in CY2020. Verified in WMS.

- 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:

Yes. Responded to numerous NASPR requests for information. No IM Notifications. No other WMS tasks assigned.

- 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:

None issued in CY2020. No open waivers.

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

Evaluator Notes:

No issues. The program has moved to a electronic file storage system.

- 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:

Yes. Tool is updated annually. No changes that affect staffing levels or days.

- 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:

Discussed. No significant changes noted. Damages per 1000 tickets up slightly in CY2020. Inspector qualification core training remains high as well as 5 year retention percentage remains at approximately 60%.

- 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:

Has discussed with operators. To date no operators have adopted the RP or implemented programs.

20 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

D-1. Repeat from prior year. A 2-point deduction for not completing all inspection types within the maximum five year intervals.

Total points scored for this section: 48
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:

A standard inspection was conducted of Lower Valley Energy's GD system located in Jackson and Afton, WY on 09/14-16/2021. Last inspected in 2020. The operator was represented. Evan Winsberg has been with the WYPSC safety program since 2018.

- 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:

Yes. The IA was utilized for documenting inspection results. IA (Form 2) Baseline Records and Baseline Field Directives were used.

- 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:

Yes. Consisted of records review and field facilities inspection. Regulator Stations general condition/signage, ROW inspection, Pipeline Markers, CP, New Construction projects under way. Inspection conducted over three days. Operator was last inspected in 2020.

- 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:

Evan demonstrated a baseline knowledge consummate with the time he has been with the safety program starting in 2018.

- 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:

Yes, an exit interview was conducted on the final day. Two AOC's identified. Final results pending. Awaiting additional records from operator.

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

Info Only = No Points

- 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:

Yes. Mr. Winsberg conducted himself in a courteous and professional manner.

7 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

No point deductions under Part "E". No issues identified.

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.
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

Yes. Question covered in IA under O&M Procedures during standard inspections. In CY2021 for the first time actually reviewing evaluating data and putting people on notice.

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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)
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:

Yes. The program is reviewing 100% of an operators reported excavation damages.

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| 3 | Has the state reviewed the operator's annual report pertaining to Part D - Excavation Damage?
Yes = 4 No = 0 Needs Improvement = 1-3 <ol style="list-style-type: none">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 |
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Evaluator Notes:

Starting in CY2021, the program now reviews all leaks reported on the annual report to determine if the operator is making the proper determination of the cause. b. When "One-Call Notification Practices Not Sufficient" is listed the program asks for an explanation and what is being done to correct the situation. c. For locating practices Not Sufficient the program asks what is being done to change this. They have even required (via commission order) audits by the operator of the contract locators to help determine these causes. d. The program reviews the qualifications of locators on a regular basis and use locating as protocol 9 evaluation. e. If the cause is locator error locators are retrained and qualified under their procedures. One contract locator has three strikes and you're out policy for locators who continue to mis-located facilities. f. Approximately 20% of line hits are from missed-locates. g. No issues from hits do to no shows. h. When mapping errors are identified by the WPSC Staff they are addressed with the operator. One operator is on a mapping improvement plan Ordered by the Commission I. Depending on the operator. As more and more information is being real time GPS'd and electronic maps are being utilized more this is down to days with some operators. If new construction is being done by contractors it can slow down to a week or so. The smaller operators still utilize paper maps and are updated as necessary. j. When excavation practices listed as not sufficient is the cause the operator is asked to explain how this was determined.

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| 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 | 2 | 2 |
|----------|--|---|---|

- 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?

Evaluator Notes:

The WYPSC is doing a better job collecting data and trends via spreadsheet. The information obtained is from operators Annual Reports.

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

No point deductions under Part F.

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:

N/A. Not a Interstate Agent or 60106 program.

- 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:

N/A. Not a Interstate Agent or 60106 program

- 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:

N/A. Not a Interstate Agent or 60106 program

- 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:

N/A. Not a Interstate Agent or 60106 program

- 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:

N/A. Not a Interstate Agent or 60106 program

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

Evaluator Notes:

N/A. Not a Interstate Agent or 60106 program

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