

**PHMSA UNDERGROUND NATURAL GAS STORAGE (UNGS)  
MT PUC PROGRAM EVALUATION – CY2020  
CONDUCTED 7/26-30/2021**

<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>17 of 17 (21)</b>
<b>E – INCIDENT INVESTIGATIONS</b>	<b>13 of 13</b>
<b>F – DAMAGE PREVENTION</b>	<b>4 of 4</b>
<b>G – FIELD INSPECTIONS</b>	<b>12 of 12</b>
<b>H - 60106 AGREEMENT STATE (if applicable)</b>	<b>NA, 0 of 0 (6)</b>
<b>TOTAL PROGRAM EVALUATION POINTS</b>	<b>98 of 98 (113)</b>

## PHMSA UNGS STATE PROGRAM EVALUATION – CY2020

<b>A – PROGRESS REPORT AND PROGRAM DOCUMENTATION REVIEW</b> <b>THIS SECTION ANALYZES ACCURACY AND COMPLETENESS OF ANNUAL PROGRESS REPORT</b>		SCORE
1	<p>Accuracy of Jurisdictional Authority and Operator/Inspection Units Data – Progress Report Attachment 1 (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: Yes. Recommended to change the ‘A’ entries to show 60105 starting with the next report as 60105 would be more correct than showing ‘A’. Is consistent with Attachment 3, Attachment 8, and Program records.</b></p>	1
2	<p>Review of Inspection Days for accuracy – Progress Report Attachment 2 (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: Yes. 17 Field days is consistent with Program records of calendar days spent in field activities. (Time charged against the program is based on actual time sheets and only shows 11 days of time charged to the UNGS program.)</b></p>	1
3	<p>Accuracy verification of Operators and Operators Inspection Units in State – Progress Report Attachment 3 (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: Yes, Attachment 3 is consistent with Attachment and Program records.</b></p>	1
4	<p>Accuracy verification of Compliance Activities – Progress Report Attachment 5 (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: Yes. 2020 work was one inspection and no violations were found.</b></p>	1
5	<p>Were UNGS program files well-organized and accessible? - Progress Report Attachment 6 (Yes= 2 points, No= 0 Points, NI=1 point)</p> <p><b>Comments: Yes. Attachment 6 is consistent with Program records.</b></p>	2
6	<p>Was employee listing and completed training accurate and complete? – Progress Report Attachment 7 (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: Yes, the UNGS training accomplished is known and pending classes are registered for.</b></p>	1
7	<p>Verification of Part 192 and 199 Rules and Amendments – Progress Report Attachment 8 (Yes= 1 point, No= 0 Points)</p> <p><b>Comments: Yes. Attachment 8 is consistent with Program records. MT PSC follows a yearly update process that is always approved for the last 30 years.</b></p>	1
8	<p>List of Planned Performance - Did State describe accomplishments on Progress Report in detail – Progress Report Attachment 10 (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: Yes. Attachment 10 addresses activities and goals of the UNGS Program.</b></p>	1
9	<p><b>General Comments:</b> Mr. G. Joel Tierney, Pipeline Safety Program Manager</p> <p>One incident 9/16/2020; Northwestern Corporation, opid 31632, Dry Creek Storage Field, Well #BN 8-3; Casing leak, non-reportable except for the gas loss, 3.3MMCF; downhole casing leak at 1900', due to corrosion, replaced part of the casing; repair costs \$550K, Gas lost \$565K total loss \$1.1M.</p> <p>UNGS PROGRESS REPORT REVIEW score is 45 of 50: 4 pt. reduction due to highest percentage of inspectors are in Category 1, II and III; 1 pt. reduction due to Maximum Civil Penalties are inadequate, \$100K/\$1M vs. \$200K/\$2M.</p> <p>Mr. James Brown, Montana Public Service Commission, 1701 Prospect Avenue, PO Box 202601 Helena, Montana 59620-2601. Part A scored 9 of 9 points.</p>	9

<b>B – PROGRAM INSPECTION PROCEDURES</b> Does State Inspection Plan include procedures that address the following elements? (See Guidelines Section 5.1)		
1	Does State have written inspection procedures? (Yes= 2 points, No= 0 Points, NI=1 point) <b>Comments: Yes. MT has included UNGS into the existing Pipeline Program procedures.</b>	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> <b>Comments: Yes. See pgs 31-33, Inspection Procedures for UNGS.</b>	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> <b>Comments: Yes. See pgs 31-33, Inspection Procedures for UNGS.</b>	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> <b>Comments: Yes. See pgs 31-33, Inspection Procedures for UNGS.</b>	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, MT does not perform a separate Wellhead inspection, it is part of a Standard UNGS Inspection.</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 pgs 31-33, Inspection Procedures for UNGS.</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 IV Inspection Planning. It now has a Link the 'Inspection Schedule' spreadsheet. The 'inspection Schedule' spreadsheet has the detail for Unit and Operator ranking. For the short term, UNGS is only 1 operator and 3 Units and yearly visits of the operator with inspection of each unit every 3 years is adequate.</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. .05x220=11 days. 17 field days reported. 17/11=1.55&gt;.38 okay. Field days are derived from calendar days in the field and Total time is derived from actual time sheets; both measured correctly. In truth very little office time was charged against UNGS, the Gas Partnership picked up most of the office time.</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. John is fully qualified, and Joel and Sam are registered for the class. Is the first 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: Yes. IA is used for everything UNGS related. MT uses IA for the Gas Program too.</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. Joel is a multi-year professional in his Program Manager position.</b></p>	2
5	<p>Did State respond to PHMSA's Evaluation Letter within 60 days and correct or address any noted deficiencies? Chapter 8.1 (Yes= 2 points, No= 0 Points, NI=1 point)  <b>Comments: NA. This is the first year of the UNGS Partnership.</b></p>	NA
6	<p>Did State inspect all types of operators and inspection units in accordance with time intervals established in their written procedures? Chapter 5.1 (Yes= 5 points, No= 0 Points, NI=1-4 points)  <b>Comments: Yes. Program procedures call for a three-year rotation for the UNGS standard and 5-year rotation for the rest. This is the first year of the UNGS program.</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, Cobb unit, UNGS Standard Inspection, appeared to be complete.</b></p>	2
8	<p>Did State complete all applicable portions of inspection forms? (Yes= 2 points, No= 0 Points, NI=1 point)  <b>Comments: Yes, Cobb unit, UNGS Standard Inspection, appeared to be complete.</b></p>	2
9	<p>Has the State reviewed Operator Annual reports, along with Incident reports, for accuracy and analyzed data for trends and operator issues? (Yes= 2 points, No= 0 Points, NI=1 point)  <b>Comments: Yes. MT is applying review strategies as appropriate to UNGS. Trending is pending as this is the first year of the UNGS partnership.</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, D&amp;A inspections for Northwestern are current.</b></p>	2
11	<p>Does the State have a mechanism for communicating with stakeholders regarding the inspection and enforcement program? (This should include making enforcement cases available to public).</p> <p>(Yes= 1 points, No= 0 Points, NI=.5 point)</p> <p><b>Comments: Yes. See Procedures Section V.13 which references Commission Rules 38.5.2205-2209 ARM which address Notification, Review, &amp; Closing of Probable Violations. and Pipeline Procedures Section IV Post Inspection Activities.</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 reported in the UNGS program.</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. MT responds to all requests.</b></p>	1
14	<p>Did the State forward any potential waivers/special permits to PHMSA for review prior to issuing them to operators?</p> <p>(Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: NA. no UNGS waivers.</b></p>	NA
15	<p>If the State has issued any waivers/special permits for any operator, has the State verified conditions of those waivers/special permits are being met? This should include having the operator amend procedures where appropriate.</p> <p>(Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: NA. no UNGS waivers.</b></p>	NA
16	<p><b>General Comments: Part C scored 29 of 29 points. Questions 5, 12, 14, &amp; 15 were NA.</b></p>	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: Yes. See Procedures Section V.13 which references Commission Rules 38.5.2205-2209 ARM which address Notification, Review, &amp; Closing of Probable Violations. and Pipeline Procedures Section IV Post inspection Activities.</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. MT PSC has followed these procedures for many years in the Gas Program. The same rules apply for the UNGS Program.</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: Yes. An exit briefing is conducted on the last day of an inspection.</b></p>	2
4	<p>Did State within 90 days, to the extent practicable, provide the owner or operator with written preliminary findings of the inspection?</p> <p>(Yes= 2 points, No= 0 Points, NI=1 point)  <b>Comments: Yes. Final Findings are on a 90-day timeline, Preliminary findings are communicated much sooner. See Procedures Section IV 'Post Inspection Activities'; Directs an Exit Briefing at the close of the inspection, and 'if applicable a notice of probable violation will be issued within 90 days'. Section V.13 which references Commission Rules 38.5.2205-2209 ARM which address Notification, Review, &amp; Closing of Probable Violations.</b></p>	2
5	<p>Did the State issue compliance actions for all probable violations discovered (60105 States)?</p> <p>(Yes= 2 points, No= 0 Points, NI=1 point)  <b>Comments: NA. Procedures are in place and followed in the Gas Program. No UNGS issues identified in 2020.</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. Procedures are in place and followed in the Gas Program. No UNGS compliance actions in 2020.</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. Joel is familiar with, and has used, civil penalties when warranted.</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. See Section C, pg 34-37, Post inspection activities. See Section V.13 which references Commission Rules 38.5.2205-2209 ARM which address Notification, Review, &amp; Closing of Probable Violations.</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. MT PSC has used their fining authority within the last 5 years.</b></p>	1
10	<p><b>General Comments: Part D scored 17 of 17 points. Questions 5 &amp; 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 Procedures Section V, pgs 38-43, which address Conducting &amp; Closing of Incident Investigations.</b></p>	2
2	<p>Does State have adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports? (Yes= 2 points, No= 0 Points, NI=1 point)</p> <p><b>Comments: Yes. See Procedures Section V, pgs 38-43, which address Conducting &amp; Closing of Incident Investigations.</b></p>	2
3	<p>Did the State keep adequate records of Incident notifications received? (Yes= 2 points, No= 0 Points, NI=1 point)</p> <p><b>Comments: Yes. The incident file was reviewed.</b></p>	2
4	<p>If onsite investigation was not made, did State obtain sufficient information from the operator and/or by other means to determine the facts to support the decision to not go on-site? Chapter 6 (Yes= 1 point, No= 0 Points, NI= .5 point)</p> <p><b>Comments: okay. An onsite visit was not made, but the issue was well defined and the remediation effort was reasonable.</b></p>	1
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: Yes. The incident was thoroughly investigated and documented. No violations were found.</b></p>	3
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: Yes, the incident was reviewed, and no violation were found.</b></p>	1
7	<p>Did the State assist the Region Office or Accident Investigation Division (AID) by taking appropriate follow-up actions related to the operator incident reports to ensure accuracy and final report has been received by PHMSA? (validate report data from operators concerning incidents and investigate discrepancies) Chapter 6 (Yes= 1 point, No= 0 Points, NI= .5 point)</p> <p><b>Comments: Yes, MT helps AID whenever requested, and a review process is followed.</b></p>	1
8	<p>Does State share lessons learned from incidents with PHMSA? (Yes= 1 point, No= 0 Points)</p> <p><b>Comments: Yes. Incidents are review during the annual Western Region NAPS meeting.</b></p>	1

9	General Comments: Part E scored 13 of 13 points.	13
---	--	----

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. Questions relative to Damage Prevention are covered in the UNGS Standard Inspection in IA.</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. By several means: including the State Dept. of Labor &amp; The Montana Utility Coordinating Council. Joel is a Board Member of the MT Utility Coordinating Council, (as required by the By-Laws of the Coordinating Council). The State One-Call Board is Lead for Damage Prevention.</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: Northwestern Corporation, opid 31632, John Torske -Utility Engineer, Butte, MT &amp; Virtual, 7/27-28/21, Patrick Gaume. Inspection of Box Elder Storage Unit, #88240. See '21 NWE Storage' in IA.</b>	
2	Was the operator or operator's representative notified and/or given the opportunity to be present during inspection? (Yes= 1 point, No= 0 Points) <b>Comments: yes. 5 Northwestern personnel participated in the inspection.</b>	1
3	Did the inspector use an appropriate inspection form/checklist and was the form/checklist used as a guide for the inspection? (Yes= 2 points, No= 0 Points, NI=1 Point) <b>Comments: Yes, a UNGS Special Inspection covering of two blocks of questions from the Standard inspection in IA. Discussed reviewing UNGS inspections performed by the Eastern Region, PHMSA. To select all of the necessary questions to be addressed within 3 years.</b>	2
4	Did the inspector thoroughly document results of the inspection? (Yes= 2 points, No= 0 Points, NI=1 Point) <b>Comments: Yes, every question was documented.</b>	2
5	Did the inspector check to see if the operator had necessary equipment during inspection to conduct tasks viewed? (Yes= 1 point, No= 0 Points) <b>Comments: Yes. The portion evaluated was focused on Procedures and Records. Office space and computers were used to communicate and access the procedures and records.</b>	1
6	Did the inspector adequately review the following during the field portion of the State Program Evaluation? <ul style="list-style-type: none"> <li>• Procedures</li> <li>• Records</li> <li>• Field Activities/Facilities</li> <li>• Other (please comment)</li> </ul> (Yes= 2 points, No= 0 Points, NI=1 Point) <b>Comments: Yes. The questions asked during the evaluation were adequately reviewed.</b>	2
7	Did the inspector have adequate knowledge of the UNGS safety program and regulations? (Evaluator will document reasons if unacceptable) (Yes= 2 points, No= 0 Points, NI=1 Point) <b>Comments: Yes. John has multiple years of experience, has completed the TQ training, and demonstrated professional competence.</b>	2
8	Did the inspector conduct an exit interview? (If inspection is not totally complete the interview should be based on areas covered during time of field evaluation) (Yes= 1 point, No= 0 Points) <b>Comments: Yes. A verbal exit interview was conducted, no violations were found, and an email will be sent in 1-2 weeks to the Northwestern VP summarizing the inspection.</b>	1

[illegible]

H - 60106 AGREEMENT STATE (if applicable)		
1	<p>Did the State use the current federal inspection form(s)? (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: NA. not a 60106 program.</b></p>	NA
2	<p>Are results documented demonstrating inspection units were reviewed in accordance with State inspection plan? (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: NA. not a 60106 program.</b></p>	NA
3	<p>Were all probable violations identified by State referred to PHMSA for compliance action? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.) (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: NA. not a 60106 program.</b></p>	NA
4	<p>Did the State immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: NA. not a 60106 program.</b></p>	NA
5	<p>Did the State give written notice to PHMSA within 60 days of all probable violations found? (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: NA. not a 60106 program.</b></p>	NA
6	<p>Did the State initially submit adequate documentation to support compliance action by PHMSA on probable violations? (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: NA. not a 60106 program.</b></p>	NA
7	<p><b>General Comments: NA. not a 60106 program. Part H is NA.</b></p>	NA