

**PHMSA UNDERGROUND NATURAL GAS STORAGE (UNGS)
INDIANA DNR PROGRAM EVALUATION – CY2021
CONDUCTED 11/28-29/2022**

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F – DAMAGE PREVENTION	0 of 0 (4)
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H - 60106 AGREEMENT STATE (if applicable)	0 of 0 (6)
TOTAL PROGRAM EVALUATION POINTS	54 of 62 (113)

PHMSA UNGS STATE PROGRAM EVALUATION – CY2021

A – PROGRESS REPORT AND PROGRAM DOCUMENTATION REVIEW THIS SECTION ANALYZES ACCURACY AND COMPLETENESS OF ANNUAL PROGRESS REPORT		SCORE
1	Accuracy of Jurisdictional Authority and Operator/Inspection Units Data – Progress Report Attachment 1 (Yes= 1 point, No= 0 Points, NI=.5 point) Comments: Yes, Attachment 1 agrees with Attachment 3 and internal records.	1
2	Review of Inspection Days for accuracy – Progress Report Attachment 2 (Yes= 1 point, No= 0 Points, NI=.5 point) Comments: NI .5 of 1 points. 278 hours reported agrees with internal records. Attachment 2 needs to show time in days and fractions of days, not hours. Same problem as last year.	0.5
3	Accuracy verification of Operators and Operators Inspection Units in State – Progress Report Attachment 3 (Yes= 1 point, No= 0 Points, NI=.5 point) Comments: Yes. Attachment 3 agrees with Attachment 1 and internal records.	1
4	Accuracy verification of Compliance Activities – Progress Report Attachment 5 (Yes= 1 point, No= 0 Points, NI=.5 point) Comments: Yes. Program performed wellhead inspections in 2021. No violations found.	1
5	Were UNGS program files well-organized and accessible? - Progress Report Attachment 6 (Yes= 2 points, No= 0 Points, NI=1 point) Comments: NI, 1 of 2 point. Program disrupted by exit of the previous Program Manager. Method for quick access to UNGS records was lost. Likely solution will be to appoint a point person to keep a spreadsheet of UNGS work and related Permit numbers to access that work quickly.	1
6	Was employee listing and completed training accurate and complete? – Progress Report Attachment 7 (Yes= 1 point, No= 0 Points, NI=.5 point) Comments: NI, 0.5 of 1 point. Corrected Attachment 7 must be submitted. The employee list needs revision and time in the program needs revision. Expect that correct Supervision time should be about 0.15 year, and correct Inspector time should be about 0.15 year. Same problem as last year.	0.5
7	Verification of Part 192 and 199 Rules and Amendments – Progress Report Attachment 8 (Yes= 1 point, No= 0 Points) Comments: Yes. Credit given, is a 60106 Program. Report is accurate. Discussed steps needed to become a 60105 Certification Partner.	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) Comments: Yes. It describes accomplishments and goals for the future.	1

9	<p>General Comments: Part A scored 7 of 9 points. Questions 2, 5, & 6 had point reductions. Attachment 7 needs correction. Daniel W. Bortner, Director, Department of Natural Resources, 402 W. Washington St., Rm. W256, Indianapolis, IN 46204; Steve Weinzapfel, Director, Division of Reclamation, DNR; Patrick Gaume PHMSA, UNGS PROGRESS REPORT REVIEW score is 36 of 50, is a 60106 Partner (-6), Highest percentage of inspectors are in categories I, II, III (-4), Chair response letter was not sent (-4): No incidents were reported in UNGS for 2021.</p>	9
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<p align="center">B – PROGRAM INSPECTION PROCEDURES</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>Comments: Yes. Underground Natural Gas Storage Well Inspection and Incident Investigation Policies and Procedures</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"> • Pre-Inspection Activities • Inspection Activities • Post Inspection Activities <p>(Yes= 2 points, No= 0 Points, NI=1 point)</p> <p>Comments: Yes. See VII. Key Inspection Activity Categories, & VIII. Standard (General Code Compliance) Inspection Procedures.</p>	2
3	<p>Integrity Management Inspections</p> <ul style="list-style-type: none"> • 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, & FLIR Camera inspections.) • Pre-Inspection Activities • Inspection Activities <p>Post Inspection Activities(Yes= 2 points, No= 0 Points, NI=1 point)</p> <p>Comments: Yes. See VII. Key Inspection Activity Categories, & VIII. Standard (General Code Compliance) Inspection Procedures.</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"> • Pre-Inspection Activities • Inspection Activities • Post Inspection Activities <p>(Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p>Comments: Yes. See VII. Key Inspection Activity Categories, & IX. Construction, Design & Testing Inspection Procedures.</p>	1
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5	<p>Wellhead Inspections</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"> • Pre-Inspection Activities • Inspection Activities • Post Inspection Activities <p>(Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p>Comments Yes. See VII. Key Inspection Activity Categories, & X. Wellhead Inspections.</p>	1
6	<p>Drug and Alcohol Inspections</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"> • Pre-Inspection Activities • Inspection Activities • Post Inspection Activities <p>(Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p>Comments: Yes. See VII. Key Inspection Activity Categories, & VIII. Standard (General Code Compliance) Inspection Procedures.</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"> • Length of time since last inspection (Within five-year interval per inspection unit) • Operating history of operator/unit and/or location (includes leakage, incident, Integrity Testing, and compliance activities) • Type of activity being undertaken by operators in inspection units (i.e. construction) • Locations of operator's inspection units being inspected - (Geographic area, Population Density, etc.) • Process to identify high-risk inspection units considering integrity threats <p>Are inspection units broken down appropriately?(Yes= 5 points, No= 0 Points, NI=1-4 points)</p> <p>Comments: Yes. See XV. COMPLIANCE FOLLOW-UP PROCEDURES</p>	5
8	<p>General Comments: Part B scored 14 of 14.</p>	14

C – PROGRAM PERFORMANCE		
1	<p>Was ratio of Total Inspection Person-Days to Total Person-Days acceptable? (Chapter 4.2)</p> <p>A = Total Inspection Person Days (Attachment 2) B = Total Inspection Person Days Charged to the program (220 x Number of Inspection person years from Attachment 7) Ratio = A/B If Ratio >= .38 then score = 5 points. If Ratio < .38 then score = 0 points. (Yes= 5 points, No= 0 Points)</p> <p>Comments: Yes. Attachment 7 needs to be amended. Very little inspector time other than Field time is charged to the UNGS Program. Estimated ratio is near 100%.</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)</p> <p>Comments: Yes. 2021 was the 3rd year of the partnership. We discussed that the lead Inspector must be registered for the PHMSA-PL1325, Safety Evaluation of Underground Storage Facilities Course ASAP, and that all who are involved with UNGS need to take the PHMSA-PL3DA Drug and Alcohol Testing for the Pipeline Industry WBT course ASAP.</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)</p> <p>Comments: NI, 1 of 2 points. No Standard UNGS inspections have been performed in this partnership through 2021. 2021 is the 3rd year of the partnership. Noted that the first Standard Inspection has been performed in 2022 and entered into IA with the help of PHMSA UNGS Staff.</p>	1
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)</p> <p>Comments: NI, 1 of 2 points. This is the first year for Steve to be acting in the Program Manager role. It is typical to expect 3 year's experience before training is complete.</p>	1
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)</p> <p>Comments: NO, 0 of 2 points. The Chairman letter was dated 4/21/22, and a Chair Response could not be found.</p>	0
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)</p> <p>Comments: okay, still within the first three years. Re-emphasized that the UNGS Standard Inspections must get started.</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)</p> <p>Comments: NA. No Standard Inspections or D&A Inspections have been performed through 2021. One Standard Inspection was loaded into IA in 2022. Attaching of applicable Wellhead Inspections was discussed.</p>	NA
8	<p>Did State complete all applicable portions of inspection forms? (Yes= 2 points, No= 0 Points, NI=1 point)</p> <p>Comments: NA. This work has yet to be started. This is a concern as this is the 3rd year of the program Partnership.</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)</p> <p>Comments: NI, 1 of 2 points. Items related to the Annual Reports have been reviewed, but the Annual Reports have not been downloaded and studied. This is a repeat from last 2 years.</p>	1

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>Comments: NI. 1 of 2 points. Discussed the requirement for D&A Inspections. No record of any D&A inspections in 2021. An MOU or other form of agreement with IURC was discussed so that D&A inspections are addressed.</p>	1
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>Comments: Yes. IDNR follows existing laws and Regulations; Indiana Applied Code (IAC) and Indiana Code (IC). The violation letters contain all information needed for appeal or making payment. See 312 IAC-29 and 312 IAC-30 for UNGS Regulations; also IC 14-37-3-9 which authorizes the IAC regulations. There is a web site at https://www.in.gov/dnr/oil-and-gas .</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>Comments: NA, none.</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>Comments: Yes. IDNR responds to all requests.</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>Comments: NA, none.</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>Comments: NA, none.</p>	NA
16	<p>General Comments: Part C scored 21 of 27 points. Questions 7, 8, 12, 14, & 15 were NA. Questions 3, 4, 5, 9, & 10 had deductions totaling 6 points</p>	21

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"> • Procedures to notify an operator (company officer) when a noncompliance is identified (60105 States) • Procedures to routinely review progress of compliance actions to prevent delays or breakdowns • Procedures regarding closing outstanding probable violations <p>(Yes= 4 points, No= 0 Points, NI=1-3 points)</p> <p>Comments: Yes. As a 60106 Partner have procedures for monitoring and closing probable violations: see Procedures: XVI. PROCEDURES FOR NOTIFYING AN OPERATOR WHEN NON-COMPLIANCE IS IDENTIFIED UNDER A 60106 PROGRAM, XVII. PROCEDURES FOR FOLLOW-UP ACTIVITIES TO ENSURE THAT CORRECTIVE ACTION HAS BEEN TAKEN BY THE OPERATOR WITHIN A SPECIFIC TIMEFRAME AFTER NOTIFICATION OF NON-COMPLIANCE, & XVIII. RECORDKEEPING PROCEDURES TO DOCUMENT THE RESULTS OF INSPECTION, FOLLOW-UP, AND COMPLIANCE ACTIONS TAKEN.</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"> • Were compliance actions sent to company officer or manager/board member if municipal/government system (60105 States)? • Document probable violations • Resolve probable violations • Routinely review progress of probable violations <p>(Yes= 4 points, No= 0 Points, NI=1-3 points)</p> <p>Comments: NA. Have no compliance issues found for the 3-year history of the UNGS Partnership.</p>	NA
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)</p> <p>Comments: Yes, for the Well Head Inspections. Any problems found would have been communicated immediately; no problems in 2019 - 2021.</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)</p> <p>Comments: NA for Wellhead inspections as no violations were found and no other work was done. The 30, 60, and 90 day notifications are in the procedures.</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)</p> <p>Comments: NA, 60106 program.</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)</p> <p>Comments: NA, 60106 program. The process is described in the Procedures.</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>Comments: NA, 60106 Program. However, the Program Manager is familiar with the Indiana DNR process for issuing civil penalties.</p>	NA
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= 0Points, NI=1 point)</p> <p>Comments: NA, 60106 Program. No violations or penalties for UNGS. Issuing civil penalties is a tool that is used by IDNR to achieve compliance. Discussed the concept of penalties for repeat violations and the others listed. IDNR has a violation matrix where these and related items are considered for assessing penalties. This will be part of the UNGS Procedures.</p>	NA
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>Comments: NA, 60106 Program.</p>	NA
10	<p>General Comments: Part D scored 6 of 6 points. Questions 2, 4, 5, 6, 7, 8, & 9 were NA.</p>	6

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>Comments: Yes. See Procedures: XIII. Investigating Incidents/Accidents Procedures.</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>Comments: Yes, IDNR has a 24hr phone number, 317-601-3087 for UNGS. Discussed that Russell was the primary contact for all things UNGS during 2021; backup contacts have been identified. Steve is the primary contact for 2022.</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>Comments: NA. No incidents during the history of the Partnership. A process for keeping Incident Records has been developed.</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>Comments: NA. No incidents during the history of the Partnership.</p>	NA
5	<p>Were all incidents investigated, thoroughly documented, and with conclusions and recommendations?</p> <ul style="list-style-type: none"> • Observations and document review • Contributing Factors • Recommendations to prevent recurrences where appropriate <p>(Yes= 3 points, No= 0 Points, NI=1-2 points)</p> <p>Comments: NA, No incidents in IN UNGS. There was a incident in 2020, but it was jurisdictional to IN URC; (August, 2020 incident at the Doe Run Storage Field, Perkins #5 Well).</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>Comments: NA, No incidents in IN UNGS.</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>Comments: Yes. IN DNR worked with PHMSA AID, PHMSA UNGS, and IN URC on the Doe Run Storage Field, Perkins #5 Well.</p>	1
8	<p>Does State share lessons learned from incidents with PHMSA? (Yes= 1 point, No= 0 Points)</p> <p>Comments: Yes. Had extensive communication with PHMSA during the 2020 Doe Run investigation. Discussed that there is not a good Forum for sharing UNGS lessons learned. Lessons learned from the 2020 incident showed that Internal communications and training is needed for personnel, Contact back-up is needed, and prompt reports, morning, mid-day, & evening, are proved as a best practice.</p>	1

9	General Comments: Part E scored 6 of 6 points. Questions 3, 4, 5,& 6 were NA.	6
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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>Comments: NA, IDNR had not conducted a UNGS Standard Inspection through 2021. Still in the First 3 years of the Program. One inspection was loaded into IA with PHMSA UNGS help. Discussed the need to get started with this; strongly recommended that action be taken ASAP.</p>	NA
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>Comments: NA, IDNR had not conducted a UNGS Standard Inspection through 2021. Still in the First 3 years of the Program. One inspection was loaded into IA with PHMSA UNGS help. Discussed the need to get started with this; strongly recommended that action be taken ASAP.</p>	NA
3	<p>General Comments: Part F scored 0 of 0 points. Both questions were NA. IDNR needs to make progress here.</p>	0

G – FIELD INSPECTIONS		
1	Operator, Inspector, Location, Date and PHMSA Representative Comments: NA, scheduling conflicts prevented a Field inspection.	
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) Comments: NA, scheduling conflicts prevented a Field inspection.	NA
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) Comments: NA, scheduling conflicts prevented a Field inspection.	NA
4	Did the inspector thoroughly document results of the inspection? (Yes= 2 points, No= 0 Points, NI=1 Point) Comments: NA, scheduling conflicts prevented a Field inspection.	NA
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) Comments: NA, scheduling conflicts prevented a Field inspection.	NA
6	Did the inspector adequately review the following during the field portion of the State Program Evaluation? <ul style="list-style-type: none"> • Procedures • Records • Field Activities/Facilities • Other (please comment) (Yes= 2 points, No= 0 Points, NI=1 Point) Comments: NA, scheduling conflicts prevented a Field inspection.	NA
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) Comments: NA, scheduling conflicts prevented a Field inspection.	NA
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) Comments: NA, scheduling conflicts prevented a Field inspection.	NA

[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>Comments: NA. no inspection work has been done other than wellhead inspections; therefore, no federal forms were used. Discussed that staffing for UNGS has been a problem.</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>Comments: NA. Procedures have been developed but UNGS inspections have not started.</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>Comments: NA. Procedures have been developed but UNGS inspections have not started.</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>Comments: NA. There have no reported conditions that may pose an imminent safety hazard.</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>Comments: NA. Procedures have been developed but UNGS inspections have not started. No violations found during the Wellhead Inspections.</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>Comments: NA. No violations have been found.</p>	NA
7	<p>General Comments: Part H scored 0 of 0 point. 6 of 6 questions were NA. UNGS work needs to be started. UNGS Procedures have been written.</p>	NA