



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue SE
Washington DC 20590

2021 Hazardous Liquid State Program Evaluation

for

Louisiana Department of Natural Resources

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



2021 Hazardous Liquid State Program Evaluation -- CY 2021
Hazardous Liquid

State Agency: Louisiana

Agency Status:

Date of Visit: 10/03/2022 - 10/07/2022

Agency Representative: Michael Peikert, Assistant Director, LDNR

PHMSA Representative: Agustin Lopez, State Evaluator, PHMSA

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

Name/Title: Richard Ieyoub, Commissioner

Agency: Louisiana Department of Natural Resources-Office of Conservation

Address: 617 North Third Street

City/State/Zip: Baton Rouge, LA 70802

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 2021 (not the status of performance at the time of the evaluation). A deficiency in any one part of a multiple-part question should be scored as "Needs Improvement." Determine the answer to the question then select the appropriate point value. If a state receives less than the maximum points, include a brief explanation in the appropriate notes/comments section. If a question is not applicable to a state, select NA. Please ensure all responses are COMPLETE and ACCURATE, and they OBJECTIVELY reflect the state's program performance for the question being evaluated. Increasing emphasis is being placed on how the state pipeline safety programs conduct and execute their pipeline safety responsibilities (their performance). This evaluation, together with selected factors reported in the state's annual progress report attachments, provide the basis for determining the state's pipeline safety grant allocation.

Scoring Summary

PARTS

Possible Points Points Scored

A Progress Report and Program Documentation Review
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

0
15
10
50
15
6
0

0
15
10
50
15
6
0

TOTALS

96 96

State Rating **100.0**

PART A - Progress Report and Program Documentation Review

Points(MAX) Score

- 1 Were the following Progress Report Items accurate? (*items not scored on progress report) Info Only 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. Verified operators with PDM and annual reports. Reviewed LDNR inspections and spreadsheets to verify data.
- b. Reviewed LDNR CY 2021 Composite spreadsheet and tracking of inspection days to verify inspection activity.
- c. Verified operators with PDM and annual reports.
- d. verified incident investigation with PDM.
- e. Compliance Actions 2021 data is tracked on spreadsheet by the LDNR. Reviewed to verify data on Progress Report.
- f. Keep electronic records of inspections. Other records are kept in office files.
- g. Compared training with Blackboard. Inspection staff qualifications are accurate. No issues identified.
- h. Have adopted all regulations within the 2 year requirement.
- i. List accomplishments and goals for coming year.

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



- | | | | |
|---|--|---|---|
| 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 Inspections b. IMP Inspections c. OQ Inspections d. Damage Prevention Inspections e. On-Site Operator Training f. Construction Inspections (annual efforts) | | |

Evaluator Notes:

LDNR Pipeline Safety Programs Guidelines has detailed inspection procedures which include pre and post inspection activities that provide guidance to inspectors.

Section 5 has detailed procedures which provide guidance on performing each type of inspection which include: TIMP, DIMP, OQ, Damage Prevention, Operator Training, PAPEI, Drug and Alcohol, Construction and LNG inspections.

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| 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 inspection b. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities) c. Type of activity being undertaken by operators (i.e. construction) d. Locations of operator's inspection units being inspected - (HCA's, Geographic area, Population Centers, etc.) e. Process to identify high-risk inspection units that includes all threats - (Excavation Damage, Corrosion, Natural Forces, Outside Forces, Material and Welds, Equipment, Operators and any Other Factors) f. Are inspection units broken down appropriately? | | |

Evaluator Notes:

Section 5 of procedures address the inspection prioritization of operator units. The prioritization includes a risk based procedure which takes into account the length of last inspection, history of operator compliance, leak history, events undertaken by operator, location and size of unit and HCA mileage.

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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 identified b. Procedures to routinely review progress of compliance actions to prevent delays or breakdowns c. Procedures regarding closing outstanding probable violations | | |

Evaluator Notes:

LDNR Standard Operating Procedures Section 10a includes the state's enforcement procedures for when a non compliance is found to the resolution of the non compliance. Section 4.7 of SOP includes a re-inspection for closing out non compliance cases. Title 43 Subpart 3, Chapter 5 provides the LDNR the enforcement authority.

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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 reports | | |

- b. If onsite investigation was not made, do procedures require on-call staff to obtain sufficient information to determine the facts to support the decision not to go on-site.

Evaluator Notes:

LDNR Standard Operating Procedures Section 5 (4.5) and 9 include incident/accident investigation procedures and has mechanism to respond to incident notifications. The LDNR investigates all reportable incidents. LDNR has procedures to form an Accident Response Team (ART) in case of large or significant incidents/accidents are reported.

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

The LDNR is mainly complying with Part B of the evaluation.

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 4.3
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 IMP Training before conducting inspection as leadc. Root Cause Training by at least one inspector/program managerd. Note any outside training completede. 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:

Verified inspector qualifications in Blackboard to assure lead inspectors are qualified to lead each type of inspection. Root cause has been taken by most inspectors.

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| 2 | Did state records and discussions with state pipeline safety program manager indicate adequate knowledge of PHMSA program and regulations?
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
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Evaluator Notes:

Michael Peikert is very knowledgeable of the pipeline safety program and regulations. He has been with the LDNR as an engineer and with Pipeline Safety for many years.

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

The LDNR is mainly complying with Part C of the evaluation.

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 | 5 |
| | <ul style="list-style-type: none">a. Standard (General Code Compliance)b. Public Awareness Effectiveness Reviewsc. Drug and Alcohold. Control Room Managemente. Construction (did state achieve 20% of total inspection person-days?)f. OQ (see Question 3 for additional requirements)g. IMP (see Question 4 for additional requirements) | | |

Evaluator Notes:

The LDNR has greatly improved their inspection intervals. Reviewed randomly selected operator units to verify LDNR is inspecting units at intervals per their procedures not to exceed 5 years

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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. Constructionf. OQ (see Question 3 for additional requirements)g. IMP (see Question 4 for additional requirements) | | |

Evaluator Notes:

Yes, reviewed randomly selected inspection reports to verify forms are being utilized to document results of inspections and for completeness. Inspection reports are electronically kept in their SONRIS online database.

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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 Part 195 Subpart G
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Yes, the LDNR is conducting OQ inspection to assure operator's plans are meeting the regulations. Field OQ Protocol 9 inspections are also performed during inspections. Reviewed randomly selected OQ inspection to assure the inspections are being conducted and documented.

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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 Part 195 Subpart F & G
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
| | <ul style="list-style-type: none">a. Are the implementation plans of the state's large/largest operators(s) being reviewed annually to ensure they are completing full cycle of the IMP process? | | |

Evaluator Notes:

Yes, the LDNR conducts IMP inspections which include review of plastic pipe/component failure threats and risks. Meet with large operator to review IMP programs.

- 5 Did the state review the following (these items are NTSB recommendations to PHMSA that have been deemed acceptable response based on PHMSA reviewing these items during the evaluation process): Chapter 5.1 2 2
- Yes = 2 No = 0 Needs Improvement = 1
- a. Operator records of previous accidents and failures including reported third-party damage and leak response to ensure appropriate operator response as required by 195.402; and
 - b. 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;

Evaluator Notes:

The LDNR addresses the NTSB questions as part of the standard inspections. The comprehensive form covers NTSB recommendation and are reviewed during the inspections.

- 6 Did the State verify Operators took appropriate action regarding advisory bulletins issued since the last evaluation? (Advisory Bulletins Current Year) 1 1
- Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

The LDNR works with their operators whenever advisory bulletins are issued. The LDNR holds annual seminars to educate their operators on advisory bulletins.

- 7 (Compliance Activities) Did the state follow compliance procedures (from discovery to resolution) and adequately document all probable violations, including what resolution or further course of action is needed to gain compliance? Chapter 5.1 10 10
- Yes = 10 No = 0 Needs Improvement = 1-9
- a. Were compliance actions sent to company officer or manager/board member if municipal/government system?
 - b. Were probable violations documented properly?
 - c. Resolve probable violations
 - d. Routinely review progress of probable violations
 - e. Did state issue compliance actions for all probable violations discovered?
 - f. Can state demonstrate fining authority for pipeline safety violations?
 - g. Does Program Manager review, approve and monitor all compliance actions? (note: Program Manager or Senior Official should sign any NOPV or related enforcement action)
 - h. Did state compliance actions give reasonable due process to all parties? Including "show cause" hearing, if necessary.
 - i. Within 30 days, conduct a post-inspection briefing with the owner or operator outlining any concerns
 - j. Within 90 days, to the extent practicable, provide the owner or operator with written preliminary findings of the inspection. (Incident investigations do not need to meet 30/90-day requirement)

Evaluator Notes:

Reviewed citation spreadsheet which tracks closed and open cases. Cases are open until a reinspection is conducted to assure compliance has been met. Even though correction actions or civil penalties are paid by the operator, cases may remain open until a follow-up reinspection is conducted.

- 8 (Accident Investigations) Were all federally reportable incidents investigated, thoroughly documented, with conclusions and recommendations? 10 10
- Yes = 10 No = 0 Needs Improvement = 1-9
- a. Does state have adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports?
 - b. Did state keep adequate records of Incident/Accident notifications received?
 - c. If onsite investigation was not made, did the state obtain sufficient information from the operator and/or by means to determine the facts to support the decision not to go on site?
 - d. Were onsite observations documented?
 - e. Were contributing factors documented?

- f. Were recommendations to prevent recurrences, where appropriate, documented?
- g. Did state initiate compliance action for any violations found during any incident/accident investigation?
- h. Did state assist Region Office or Accident Investigation Division (AID) by taking appropriate follow-up actions related to the operator incident reports to ensure accuracy and final report has been received by PHMSA?
- i. Does state share any lessons learned from incidents/accidents?

Evaluator Notes:

All reportable incidents were investigated. Reviewed incident investigation reports conducted by the LDNR.

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| 9 | Did state respond to Chairman's letter on previous evaluation within 60 days and correct or address any noted deficiencies? (If necessary) Chapter 8.1
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

Yes received response within the 60 day requirement.

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

Yes, have an annual seminar which PHMSA and industry participate.

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

Yes, question is part of the standard inspection form.

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| 12 | Does the state have a mechanism for communicating with stakeholders - other than state pipeline safety seminar? (This should include making enforcement cases available to public).
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

Yes, the LDNR website is very informative and has inspection reports available to the public.

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| 13 | Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.7
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

Yes, the LDNR follows up on SRCR in PHMSA's WMS.

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| 14 | Was the State responsive to:
Yes = 1 No = 0 Needs Improvement = .5
a. Surveys or information requests from NAPS or PHMSA; and
b. PHMSA Work Management system tasks? | 1 | 1 |
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Evaluator Notes:

Yes, the LDNR is very responsive to NAPS and PHMSA surveys, notification and any questions

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| 15 | If the State has issued any waivers/special permits for any operator, has the state verified conditions of those waivers/special permits are being met? This should include having the operator amend procedures where appropriate.
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|--|---|---|

Evaluator Notes:

Renewed waiver on Oct 2021 to Maurepas Pipeline LLC to allow no CP due to having coating/insulation on pipeline to maintain heat on product transported. The pipeline has conditions that have to be met in order to maintain waiver which the LDNR monitors to assure Maurepas meets conditions.

Have two additional waivers involving IMTT which involve one pipeline that was not built and another which involves Harvest and construction has not begun dealing with flexsteel.

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

Evaluator Notes:

Yes, files are very organized. Inspection reports are kept electronically online.

- 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:

Discussed SICT with LDNR, no concerns or issues in meeting the inspection days.

- 18** Discussion on State Program Performance Metrics found on Stakeholder Communication Info Only Info Only
site.\ <http://primis.phmsa.dot.gov/comm/states.htm?nocache=4805>
Info Only = No Points

Evaluator Notes:

Discussed State Performance Metrics with LDNR. Damages per 1,000 are at 2.5 which is on a down trend. Trained inspectors has increased and retainment is improving. Repaired leaks has increased, hazardous leaks is lower as is scheduled leaks for repair which is are good trend.

- 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:

Had Sam Minifie from API present during the Pipeline Safety seminar. Would most be implemented by larger operators. Municipalities and small operators may not have the personnel to implement.

- 20** General Comments: Info Only Info Only
Info Only = No Points

Evaluator Notes:

The LDNR is mainly complying with Part D of the evaluation.

Total points scored for this section: 50
Total possible points for this section: 50

PART E - Field Inspections

Points(MAX) Score

- 1 Operator, Inspector, Location, Date and PHMSA Representative (enter specifics into the comments box below) Info Only 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:

Harvest Midstream
Thien Le- LDNR Lead Inspector
Jeremy Jeffery- LDNR Inspector
Virtual inspection
March 29-April 1, 2022
Agustin Lopez- PHMSA State Evaluator

- Mr. Thien Le conducted an IMP Inspection of Harvest Midstream.
- Last inspection was in 2017.
- Yes, pipeline representatives were present during the inspection.
- Mr. Thien Le has not been evaluated in the recent past.

- 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 inspector utilized the IA equivalent IMP form to use as a guide and to document the results of the inspection.

- 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 the IMP Plan was reviewed during the inspection to verify compliance with the regulations.
- Yes, records were reviewed during the inspection.
- No field portion was part of this inspection.
- No other inspection activities.
- Yes, the length of the inspection was adequate.

- 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:

Yes, Mr. Thien Le has been with the LDNR for more than 5 years and is very knowledgeable of the pipeline safety program and regulations.

- 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 at the conclusion of the inspection and the operator was given an Inspection Summary. The following were issues identified during the inspection:

RECOMMENDATIONS:

Integrity Assessments

3. IMP Assessment Methods: Does the process specify assessment methods that are appropriate for the pipeline integrity threats? (Procedures)

Found in 2021 Harvest HL Integrity Management Plan Section 3.5 Integrity Assessment Methods and Appendix H Assessment Method Selection Master Flowchart. Suggestion to operator to be more detailed on how spike test was performed for each pipeline segment's threats.

6. IMP Baseline and/or Continual Assessments Prioritized Assessment Schedule: Do the records indicate that assessments are implemented as specified in the assessment plan? (Records)

Reviewed Harvest Baseline Assessment Plan and Reassessment Schedule spreadsheet. Suggestion to operator to add pipe specifications such as: wall thickness, Grade, MOP, original hydrostatic test values. In addition, the operator should add HCA mileages, past reassessment, most recent assessment, and future assessment dates and methods in the spreadsheet. Also, if assessment intervals and methods changed, please describe in the notes section.

In-Line Inspection (Smart Pigs)

7. Validation of ILI Results: Does the process include the validation of ILI results? (Procedures)

Found in 2021 Harvest HL Integrity Management Program Section 4.2.2 and Section 3.4 Integrity Assessment Methods. Suggestion to operator to define the acceptance criteria (such as physical damage to the sensors, missing data, lost sensor channels during data collection, sensor noise, distance inaccuracy, missed features e.g. valves, welds, tees, etc., velocity overrun or under run and cleanliness of pipe (debris/sludge removed from receiver)).

Integrity Assessment Via Pressure Test

1. Pressure Test Acceptance Criteria and Procedures: Does the process define acceptance criteria for a successful pressure test? (Procedures)

Found in P-195.300 Pressure Testing. Also found in Section 4.3 Hydrotest Assessment Data Review. Suggestion to operator to identify who can approve a pressure test result in P-195.300.

Other Technology

1. Other Technology Process: If "Other Technologies" are used, does the process provide an equivalent understanding of the condition of the line pipe? (Procedures)

Found in 2021 Harvest HL Integrity Management Program Section 3.5.4 Other Technology. Suggestion to operator to include the appropriate state agencies' contact information in IMP Plan.

Preventive and Mitigative Measures

11. P&M Measures - Evaluation for EFRDs: Do the records demonstrate that all required and other relevant EFRD evaluation factors were evaluated and any actions that have been taken are appropriate? (Records)

Suggestion to operator to include additional information in the records of evaluation for EFRDs such as why the operator should install EFRDs at the specific location, how EFRDs protect HCA segments, pipeline shutdown capabilities, or location of nearest response personnel, etc.

POTENTIAL ISSUES:

195.452(f)(1): A process for identifying which pipeline segments could affect a high consequence area;

195.452(f)(3): An analysis that integrates all available information about the integrity of the entire pipeline and the consequences of a failure

195.452(l)(1)(ii): Documents to support the decisions and analyses, including any modifications, justifications, deviations and determinations made, variances, and actions taken, to implement and evaluate each element of the integrity management program listed in paragraph (f) of this section.

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- 6 Was inspection performed in a safe, positive, and constructive manner ? Info Only Info Only
Info Only = No Points
- a. No unsafe acts should be performed during inspection by the state inspector
 - b. What did the inspector observe in the field? (Narrative description of field observations and how inspector performed)
 - c. Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices)
 - d. Other

Evaluator Notes:

Yes the inspection was performed in a safe, positive and constructive manner.

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

Evaluator Notes:

Mr. Thien Le performed an excellent inspection of Harvest Midstream IMP Plan. He conducted a thorough inspection and was very knowledgeable of the pipeline safety regulations. He is a great asset to the LDNR.

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 |
|---|--|---|---|

Evaluator Notes:

Review Annual Reports for accuracies and leak prone pipe, unaccounted gas to prioritize inspections. Apply prioritization/risk to SICT and inspection scheduling.

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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 |
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Evaluator Notes:

Yes, review annual reports Part D for damages to find trends or issues. Have increased Excavation Damages enforcement due to increase in one-call violations. Damage Prevention Enforcement findings are reviewed to check for concern areas with specific operators.

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| 3 | Has the state reviewed the operator's annual report pertaining to Part D - Excavation Damage?
Info Only = No Points <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)? | Info Only | Info Only |
|---|--|-----------|-----------|

Evaluator Notes:

Yes, reviewed Annual Reports pertaining to Part D. Analyze for trends. During enforcement of damage prevention causes are analyzed and enforcement issued if operator violates one-call laws. Damage Prevention Enforcement findings are reviewed to check for concern areas with specific operators.

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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 <ol style="list-style-type: none">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. | 2 | 2 |
|---|--|---|---|

- 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 LDNR collects data from annual reports and enforcement to be able to analyze and trend excavation damages. With the LDNR now having enforcement more data is readily available to analyze and trend in the near future.

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

The LDNR is mainly complying with Part F of the evaluation.

Total points scored for this section: 6
Total possible points for this section: 6



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:

LDNR does not have an interstate agent agreement nor a 60105 certification.

- 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:

LDNR does not have an interstate agent agreement nor a 60105 certification.

- 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:

LDNR does not have an interstate agent agreement nor a 60105 certification.

- 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:

LDNR does not have an interstate agent agreement nor a 60105 certification.

- 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:

LDNR does not have an interstate agent agreement nor a 60105 certification.

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

Evaluator Notes:

LDNR does not have an interstate agent agreement nor a 60105 certification.

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