

PHMSA UNDERGROUND NATURAL GAS STORAGE (UNGS)
MI PSC PROGRAM EVALUATION – CY2021
CONDUCTED 10/31-11/2, and 11/15-16/2022

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TOTAL PROGRAM EVALUATION POINTS	92 of 92 (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 is in agreement with State Partner records, Attachment 3, and Attachment 8.	1
2	Review of Inspection Days for accuracy – Progress Report Attachment 2 (Yes= 1 point, No= 0 Points, NI=.5 point) Comments: Yes. Attachment 2 is in agreement with State Partner records.	1
3	Accuracy verification of Operators and Operators Inspection Units in State – Progress Report Attachment 3 (Yes= 1 point, No= 0 Points, NI=.5 point) Comments: Yes. Attachment 3 is in agreement with State Partner records and Attachment 1	1
4	Accuracy verification of Compliance Activities – Progress Report Attachment 5 (Yes= 1 point, No= 0 Points, NI=.5 point) Comments: Yes. Attachment 5 is consistent with State Partner Records.	1
5	Were UNGS program files well-organized and accessible? - Progress Report Attachment 6 (Yes= 2 points, No= 0 Points, NI=1 point) Comments: Yes. The files are electronic and easily accessed.	2
6	Was employee listing and completed training accurate and complete? – Progress Report Attachment 7 (Yes= 1 point, No= 0 Points, NI=.5 point) Comments: Yes. Attachment 7 is consistent with State Partner Records for training.	1
7	Verification of Part 192 and 199 Rules and Amendments – Progress Report Attachment 8 (Yes= 1 point, No= 0 Points) Comments: Yes. Attachment 8 is consistent with State Partner Records	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. Attachment 10 describes items accomplished in 2021 and the activities planned for 2022.	1
9	General Comments: Mr. Dan Scripps, Chair, Michigan Public Service Commission, 7109 West Saginaw Highway, Lansing, MI 48917; David Chislea, Program Manager, MPSC, Patrick Gaume, PHMSA. UNGS PROGRESS REPORT REVIEW score is 44 of 50: Highest percentage of inspectors is in categories I, II, & III, & Maximum Civil Penalties are below 100K/1MM. No incidents were reported in UNGS for 2021. Part A scored 9 of 9 points.	9

<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, the UNGS inspection program has adopted the existing pipeline safety program 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. Pre-Inspection Activities can be found in Section 2.10. Inspection activities are in Section 2.11 (beginning) Post Inspection Activities can be found in Sections 2.16 & 2.17.</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. Pre-Inspection Activities can be found in Section 2.10. Inspection activities are in Section 2.11 (beginning) Post Inspection Activities can be found in Sections 2.16 & 2.17.</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. Pre-Inspection Activities can be found in Section 2.10. Inspection activities are in Section 2.11 (beginning) Post Inspection Activities can be found in Sections 2.16 & 2.17.</p>	1

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: Okay, MI did not have a unique WH inspection for UNGS in 2021. It is part of the Standard Inspection. Effective 2023, the WH EGLE Form under Part 615 will be modified and used in UNGS.</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. Drug and Alcohol Inspections are conducted and led by the MPSC's pipeline safety program staff and UNGS program staff participate for operators with intrastate UNGS assets. Drug and Alcohol Inspection guidance are in Section 2.11, Bullet #10 of the MPSC Program Guidelines.</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 Section 3.1 of the Program Guidelines.</p>	5
8	<p>General Comments: Part B scored 14 of 14 points</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) Comments: Okay. $53/(220*0.19)=1.27$; $1.27>0.38$. It is likely time spent in UNGS is being under reported.</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) Comments: Okay for 2021. First year of the UNGS partnership. Many have taken the classes and the rest have the classes scheduled.</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) Comments: Yes. MI uses IA as an interstate Agent for are Gas Program. Skills in IA are already acquired, and IA is being used for UNGS. Advised that ALL UNGS inspections need to be recorded in IA.</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) Comments: Yes. David is Program Manager for the MI Gas Partnership, and he is applying those skills to UNGS.</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) Comments: NA. This is the first year of the UNGS Partnership.</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) Comments: Yes. Is first year of program and on a 4 yr inspection cycle plan. Discussed that it may be changed. Visited 3 of the 6 operators, and 11 of the 30 Units.</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) Comments: Yes, IA is being used and the appropriate modules are uploaded into the inspection.</p>	2
8	<p>Did State complete all applicable portions of inspection forms? (Yes= 2 points, No= 0 Points, NI=1 point) Comments: Yes, they are complete.</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) Comments: Yes. Covered in Reporting section of standard program inspection: Procedure Question 12, Record Question 13. Going forward an inspection form will be developed that reviews annual reports for all operators as they are received.</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>Comments: Okay. First year of UNGS Program. Discussed that D&A inspections need to be recorded in IA to be applicable to UNGS.</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>Comments: Yes. Through the Website; https://www.michigan.gov/mpsc/-/media/Project/Websites/mpsc/regulatory/nat-gas/2022-Pipeline-Safety-Operator-Communication.pdf?rev=628503fbacc0485bb84dbb5afefa23fd&hash=6FF7A815142D4768FBF6B01CBE3277D0 and by particular contact with the biggest 4 operators in the State.</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. No SRC in UNGS.</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. MI responds to all requests. No requests were made in 2021.</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 in the UNGS Program.</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 in the UNGS Program.</p>	NA
16	<p>General Comments: Part C scored 29 OF 29 points. Questions 5, 12, 14, & 15 were NA.</p>	29

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) Comments: YES. See Section 5.3 (Written NC Letter) of the PG. Also, Sections 2.16 (Exit Summary - 30-day briefing) and 2.17 (Post-Inspection – 90-day Notification). Section 5.9 (Follow-up) and Section 5.5 (resolution of NC) of the PG. Section 5.5 (Resolution of NC) and Section 5.10 (Verification).</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) Comments: Yes. Violations found in 2021 are following the established compliance procedures.</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) Comments: Yes. They are following their procedures, see Section 2.16.</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) Comments: Yes. They are following their procedures, see Section 2.17.</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) Comments: Yes. The inspections and letters are in agreement.</p>	2
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) Comments: Yes. They are following the established compliance procedures</p>	2

7	<p>Is the Program Manager familiar with State process for imposing civil penalties (60105 States)? (describe any actions taken) (Yes= 2 points, No= 0 Points, NI=1 point)</p> <p>Comments: Yes. The Program is familiar with the process for issuing fines.</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= 0Points, NI=1 point)</p> <p>Comments: NA. No fines in UNGS to date.</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: Yes. No fines in UNGS as it is a new program, but there are several fines in the Gas Program.</p>	1
10	<p>General Comments: Part D scored 19 of 19 points. Question 8 was NA.</p>	19

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 sections 6 and 7 of Program Guidelines.</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. On Call System: 517-284-8230, See Section 6.6 (Staff Expectations) of the PG, & the Program Manager is always on-Call as needed.</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 for UNGS. NONE IN 2021. Procedures are in place and proved in the Gas Program.</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 for UNGS. NONE IN 2021. Procedures are in place and proved in the Gas Program.</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 for UNGS. NONE IN 2021. Procedures are in place and proved in the Gas Program.</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 for UNGS. NONE IN 2021. Procedures are in place and proved in the Gas Program.</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: NA for UNGS. NONE IN 2021. Procedures are in place and proved in the Gas Program.</p>	NA
8	<p>Does State share lessons learned from incidents with PHMSA? (Yes= 1 point, No= 0 Points)</p> <p>Comments: Yes. During Central Region NAPSR Meetings.</p>	1

9	General Comments: Part E scored 5 of 5 Points. Questions 3, 4, 5, 6, & 7 were NA.	5
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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: Yes. Operators damage prevention activities are reviewed and inspected by the MPSC's pipeline safety program under 192.614 and the MPSC's Damage Prevention program under enforcement authority in PA 174 of 2013.</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>Comments: Yes, the MPSC has enforcement authority of Michigan's one call law, PA 174 of 2013. The MPSC's Damage Prevention program is actively engaged with Michigan stakeholders through education and enforcement activities to promote the reduction of incidents involving excavation damage.</p>	2
3	<p>General Comments: Part F scored 4 of 4 points.</p>	4

G – FIELD INSPECTIONS		
1	<p>Operator, Inspector, Location, Date and PHMSA Representative</p> <p>Comments: Field inspection on Wed. Nov 15-16, 2022.</p> <p>LEE 8 STORAGE PARTNERSHIP, opid 30786, Kevin Spence Public Utilities Engineering Specialist, Virtual, at the Howell Facility, Howell, MI; and at the Lee 8 Storage Facility in Olivet, MI. Nov 15-16, 2022, Patrick Gaume. See '2022 30786 UNGS LEE STORAGE PARTNERS' in IA. EGLE INSPECTORS Larry Organek, Eric Kimber, & Jason Mailloux also participated in the inspection.</p>	
2	<p>Was the operator or operator's representative notified and/or given the opportunity to be present during inspection?</p> <p>(Yes= 1 point, No= 0 Points)</p> <p>Comments: Yes. Nine Lee Storage Personnel participated in the inspection.</p>	1
3	<p>Did the inspector use an appropriate inspection form/checklist and was the form/checklist used as a guide for the inspection?</p> <p>(Yes= 2 points, No= 0 Points, NI=1 Point)</p> <p>Comments: Yes. IA was used and appropriate modules were selected.</p>	2
4	<p>Did the inspector thoroughly document results of the inspection?</p> <p>(Yes= 2 points, No= 0 Points, NI=1 Point)</p> <p>Comments: Yes. All questions were documented.</p>	2
5	<p>Did the inspector check to see if the operator had necessary equipment during inspection to conduct tasks viewed?</p> <p>(Yes= 1 point, No= 0 Points)</p> <p>Comments: Yes. Included office and computer resources, vehicles, pressure test gauges, and hand tools.</p>	1
6	<p>Did the inspector adequately review the following during the field portion of the State Program Evaluation?</p> <ul style="list-style-type: none"> • Procedures • Records • Field Activities/Facilities • Other (please comment) <p>(Yes= 2 points, No= 0 Points, NI=1 Point)</p> <p>Comments: This was a full Standard Inspection and included Procedures, Records, and Field for the 6 usual modules in IA for a depleted hydrocarbon Reservoir UNGS facility.</p>	2
7	<p>Did the inspector have adequate knowledge of the UNGS safety program and regulations?</p> <p>(Evaluator will document reasons if unacceptable)</p> <p>(Yes= 2 points, No= 0 Points, NI=1 Point)</p> <p>Comments: Yes. Kevin and his co-workers demonstrated a great depth of knowledge for this inspection.</p>	2
8	<p>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)</p> <p>(Yes= 1 point, No= 0 Points)</p> <p>Comments: Yes. Four items of concern were noted, discussed, and were agreed on. No violations were found.</p>	1

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. not a 60106 Agreement Program.</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. not a 60106 Agreement Program.</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. not a 60106 Agreement Program.</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. not a 60106 Agreement Program.</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. not a 60106 Agreement Program.</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. not a 60106 Agreement Program.</p>	NA
7	General Comments: Part H is NA. not a 60106 Agreement Program.	0