



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

1200 New Jersey Avenue SE
Washington DC 20590

2021 Gas State Program Evaluation

for

Minnesota Office of Pipeline Safety

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 Gas State Program Evaluation -- CY 2021

Gas

State Agency: Minnesota

Agency Status:

Date of Visit: 08/08/2022 - 08/11/2022

Agency Representative: Jonathan Wolfram

PHMSA Representative: Joe Subsits

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

Name/Title: John Harrington, Commissioner of Public Safety

Agency: Minnesota Department of Public Safety

Address: 445 N Minnesota street

City/State/Zip: St. Paul, MN 55101

Rating:

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

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

A	Progress Report and Program Documentation Review
B	Program Inspection Procedures
C	State Qualifications
D	Program Performance
E	Field Inspections
F	Damage prevention and Annual report analysis
G	Interstate Agent/Agreement States

Possible Points Points Scored

0	0
15	15
10	10
50	49
15	15
10	10
0	0
100	99

TOTALS

State Rating **99.0**

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
- Stats On Operators Data - Progress Report Attachment 1
 - State Inspection Activity Data - Progress Report Attachment 2
 - List of Operators Data - Progress Report Attachment 3*
 - Incidents/Accidents Data - Progress Report Attachment 4*
 - Stats of Compliance Actions Data - Progress Report Attachment 5*
 - List of Records Kept Data - Progress Report Attachment 6 *
 - Staff and TQ Training Data - Progress Report Attachment 7
 - Compliance with Federal Regulations Data - Progress Report Attachment 8
 - Performance and Damage Prevention Question Data - Progress Report Attachment 10*

Evaluator Notes:

- Minnesota reports 20 private distribution systems with 55 units, 33 Municipal systems with 34 units, 2 master meters with 3 units, 14 LPG with 21 units, 25 intrastate transmission with 26 units 2 intrastate LNG with 3 units. There are also 8 interstate transmission with 13 units and 1 interstate LNG with 1 unit. This information was collected from the Sales Force data base. One operator changed from distribution to transmission.
- Minnesota recorded 971 inspection days . 725 SICT days were calculated. 272 days were construction days. This is 28% of the total inspection days. Days were calculated from the Sales force data base. Data is derived from timesheets. Personnel fill out two time sheets. Direct supervisor and administrative staff check the two timesheets for consistency.
- Attachment 1 and 3 match the the unit count. Random operators were found on attachment 3.
- There were two gas incidents in Minnesota last year. These were identified in the progress report. These were a LNG equipment failure of Northern States Power Company of Minnesota on 1/4/2021 and Excavation damage of Great Plains Natural gas on 6/30/2021. 30 day reports were submitted for these incidents.
- 29 violations carried over from 2020. This is consistent with the previous two progress reports. The numbers on the compliance attachment add up correctly. This information was collected from Sales Force.
- Records are stored electronically. Information was readily retrievable.
- Progress report and T&Q information was compared and found to correspond.
- Minnesota is up to date on rule amendment adoptions.
- 2021 accomplishments include holding a virtual conference, transitioning to virtual inspections, issuing an alert on regulatory reform, conducted damage prevention presentations virtually.

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. TIMP and DIMP Inspections (reviewing largest operator(s) plans annually) c. OQ Inspections d. Damage Prevention Inspections e. On-Site Operator Training f. Construction Inspections (annual efforts) g. LNG Inspections | | |

Evaluator Notes:

Pre inspection procedures are addressed in sections 5.1(3) and 5.2. Inspection procedures are found in Section 5.2. Post inspection procedures are found in section 5.1.(3) and Section 5.2.

- a. Standard inspections are addressed in section 5.2.1, Control room management is found in section 5.2.9, Public awareness inspections are addressed in section 5.2.10, Drug and alcohol inspections are addressed in 5.2.11.
- b. TIMP/DIMP is addressed in section 5.2.4.
- c. OQ inspections are found in section 5.2.5.
- d. Damage Prevention investigations are addressed in Section 5.2.7.
- e. Operator training is addressed in section 5.2.3.
- f. Construction inspections are addressed in Section 5.2.2.
- g. LNG inspections are addressed in section 5.2.14.

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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:

Risk based criteria and inspection days are addressed in section 4.1. A List of risk assessment criteria is identified in section 4.1.1.

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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:

Compliance procedures are addressed in Section 5.3.

- a. Section 5.3.1 addresses notification to company officers when non-compliance is identified. Section 5.1 addresses exit interview and findings letter time requirements. Opportunities for hearing are addressed in section 5.3.2.2. Civil penalties are addressed in section 5.3.2.5.
- b. Follow up activity is addressed in section 5.3.1.
- c. Follow up activity is addressed in section 5.3.1.(3)

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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? | 3 | 3 |
|---|--|---|---|
- Yes = 3 No = 0 Needs Improvement = 1-2
- 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:

Accident/incident procedures are found in Section 6. Procedure 6.1 mentions FIR. Observations, contributing factors and recommendations have been added to state investigation forms.

- a. Section 6.1 states that PHMSA will notify state when a notification occurs. Table 6.1 show a on-scene deployment matrix. Section 6.4 addresses notifications received from the Minnesota duty Officer.
- b. Section 6.4 requires documentation in Sales Force when an on-site investigation cannot be made.

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| 5 | General Comments: | Info Only | Info Only |
|---|-------------------|-----------|-----------|
- Info Only = No Points

Evaluator Notes:

No issues with Part B

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 |
|---|--|---|---|
- a. Completion of Required OQ Training before conducting inspection as lead
 - b. Completion of Required DIMP/IMP Training before conducting inspection as lead
 - c. Completion of Required LNG Training before conducting inspection as lead
 - d. Root Cause Training by at least one inspector/program manager
 - e. Note any outside training completed
 - f. 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:

Yes, Core gas inspectors are Jeff Blackwell, Thomas Chrisfield, Thomas Coffman, Patrick Donovan, Joseph Hauger, Estelle Hickman, Michael Menidiola, Olaf, Engebretson, Adam Ratzlaff, Elizebeth Skalne, Jon Sogard, Todd Stansbury and Jonathan Wolfram.

- a. Operator qualification inspectors are Jeff Blackwell, Thomas Chrisfield, Thomas Coffman, Patrick Donovan, Joseph Hauger, Estelle Hickman, Michael Menidiola, Olaf, Engebretson, Adam Ratzlaff, Elizebeth Skalne, Jon Sogard, Todd Stansbury and Jonathan Wolfram.
- b. IMP qualified inspectors are Jeff Blackwell, Thomas Coffman, Joseph Hauger, Michael Menidiola, Olaf Engebretson, Adam Ratzlaff, Elizebeth Skalne, Jon Sogard, Todd Stansbury and Jonathan Wolfram. DIMP qualified personnel are Jeff Blackwell, Thomas Chrisfield, Thomas Coffman, Patrick Donovan, Joseph Hauger, Estelle Hickman, Michael Menidiola, Olaf Engebretson, Adam Ratzlaff, Elizebeth Skalne, Jon Sogard, Todd Stansbury and Jonathan Wolfram. Failure investigation qualified personnel are Jeff Blackwell, Thomas Chrisfield, Thomas Coffman, Patrick Donovan, Joseph Hauger, Estelle Hickman, Michael Menidiola, Olaf Engebretson, Adam Ratzlaff, Elizebeth Skalne, Jon Sogard, Todd Stansbury and Jonathan Wolfram. LNG qualified are Jeff Blackwell, Patrick Donovan, Michael Menidiola, Olaf Engebretson, Adam Ratzlaff, Elizebeth Skalne and Todd Stansbury.
- c. LNG qualified inspectors are Jeff Blackwell, Patrick Donovan, Michael Menidiola, Olaf Engebretson, Adam Ratzlaff, Elizebeth Skalne and Todd Stansbury.
- d. Root cause trained personnel are Jeff Blackwell, Joseph Hauger, Michael Menidiola, Olaf Engebretson, Adam Ratzlaff, Elizebeth Skalne, Jon Sogard, Todd Stansbury and Jonathan Wolfram.
- e. Wisconsin conducted an LNG class and Minnesota sent four people to that class.
- f. Minnesota has a probation checklist which is required to be filled out before an inspector is fully qualified.

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

Evaluator Notes:

Jon is currently VP of NAPS. John has all the core T&Q and IMP training. Jon is familiar with pipeline safety regulation and processes. Jon came started with Minnesota in 2009 and has been a Program Manager for 10 year.

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

There were no concerns with part C.

Total points scored for this section: 10
Total possible points for this section: 10

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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 | 4 |
|---|--|---|---|
- a. Standard (General Code Compliance)
 - b. Public Awareness Effectiveness Reviews
 - c. Drug and Alcohol
 - d. Control Room Management
 - e. Part 193 LNG Inspections
 - f. Construction (did state achieve 20% of total inspection person-days?)
 - g. OQ (see Question 3 for additional requirements)
 - h. IMP/DIMP (see Question 4 for additional requirements)

Evaluator Notes:

Checked the inspection dates and inspection intervals for operators on the random inspection list.

- a. Standard inspections for large operators are performed annually. All standard inspections were performed within the required time intervals.
- b. Public awareness effectiveness inspections were performed within the required time intervals.
- c. Drug and Alcohol inspections were checked and found to be 1 year late for Dooleys and Argyle distribution. This was due to a database planning glitch and was resolved. This results in a 1 point deduction.
- d. Control Room management inspections were done within the required time intervals.
- e. LNG inspections are performed annually. These inspections were performed within the required time intervals.
- f. There were 272 construction days which was 28% of Minnesota's inspection days.
- g. Operator Qualification inspections were within the required time frequencies.
- h. IMP/DIMP inspections were within the required time frequencies.

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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 |
|---|---|----|----|
- a. Standard (General Code Compliance)
 - b. Public Awareness Effectiveness Reviews
 - c. Drug and Alcohol
 - d. Control Room Management
 - e. Part 193 LNG Inspections
 - f. Construction
 - g. OQ (see Question 3 for additional requirements)
 - h. IMP/DIMP (see Question 4 for additional requirements)

Evaluator Notes:

IA is used for most inspections. An O& M procedures review is scheduled to be completed every 5 years.

- a. IA is used for standard inspections.
- b. IA is used for public awareness inspections.
- c. IA is used for drug and alcohol inspections.
- d. IA is used for Control room inspections.
- e. IA is used for LNG inspections.
- f. The state its own form for construction inspections.
- g. IA is used for Operator Qualification inspections.
- h. IA is used for IMP/DIMP inspections.

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| 3 | Is state verifying monitoring (Protocol 9/Form15) of operators OQ programs? This should include verification of any plan updates and that persons performing covered tasks (including contractors) are properly qualified and requalified at intervals established in the operator's plan. 49 CFR 192 Part N
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

OQ inspections were checked and within required timeframes. Protocol 9 is performed within 5 year intervals for each unit.

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| 4 | Is state verifying operator's integrity management Programs (IMP and DIMP)? This should include a review of plans, along with monitoring progress. In addition, the review should take in to account program review and updates of operator's plan(s). 49 CFR 192 Subparts O and P
Yes = 2 No = 0 Needs Improvement = 1 <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? b. Are states verifying with operators any plastic pipe and components that have shown a record of defects/leaks and mitigating those through DIMP plan? c. Are the states verifying operators are including low pressure distribution systems in their threat analysis? | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

IMP/DIMP inspections are within the required timeframes.

- a. Large operators are sent Request for specific information annually. The request are reviewed by the inspector assigned to the operator. These requests are used to to annually review IMP/DIMP programs.
- b. Identification of problematic pipe is performed during DIMP inspections.
- c. There is no low pressure systems in Minnesota. Excel had a system that was eliminated as validated in an April 11, 2021 memo. This issue is also reviewed as part of annual report review process. A low pressure system alert notice was sent out by the State.

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| 5 | Did the state review the following (these items are NTSB recommendations to PHMSA that have been deemed acceptable response based on PHMSA reviewing these items during the evaluation process): Chapter 5.1
Yes = 2 No = 0 Needs Improvement = 1 <ul style="list-style-type: none"> a. Operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken; b. Operator procedures for surveillance of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leakage history, or other unusual operating maintenance condition? (Note: See GPTC Appendix G-18 for guidance); c. Operator emergency response procedures for leaks caused by excavation damage near buildings and determine whether the procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings Refer to 4/12/01 letter from PHMSA in response to NTSB recommendation P-00-20 and P-00-21; d. Operator records of previous accidents and failures including reported third-party damage and leak response to ensure appropriate operator response as required by 192.617; e. Directional drilling/boring procedures of each pipeline operator or its contractor to determine if they include actions to protect their facilities from the dangers posed by drilling and other trench less technologies; f. Operator procedures for considering low pressure distribution systems in threat analysis? g. Operator compliance with state and federal regulations for regulators located inside buildings? | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

- a-b There is no cast iron in Minnesota.
- c-g Minnesota sends out a request for information when NTSB notices are released. These notices solicit responses from the operator.

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

2021 Advisory bulletin on controlling gas releases resulted in a "Request for Information" to the operators. 114 inspections are also performed.

7	(Compliance Activities) Did the state follow compliance procedures (from discovery to resolution) and adequately document all probable violations, including what resolution or further course of action is needed to gain compliance? Chapter 5.1 Yes = 10 No = 0 Needs Improvement = 1-9	10	10
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- 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:

- Compliance actions were reviewed when random operator inspection reports were reviewed. No issues were found.
- a. Compliance letters are sent to the chief executive officer.
 - b. Compliance issues were documented properly.
 - c. Most compliance issues were resolved. Some issues are ongoing and require follow up. No issues were identified.
 - d. Minnesota has an adequate process for following up on ongoing compliance issues. These issues are tracked in the Sales Force data base.
 - e. All compliance issues identified during inspections were listed in the appropriate compliance letter.
 - f. Penalties were assessed \$1.7 M for gas Operators. \$1.4 M was for CFR violations. \$114,000 was collected for CFR violations. \$366,00 total was collected.
 - g. Letters are reviewed by the inspector's direct supervisor and signed and reviewed by Jon.
 - h. Minnesota offers opportunity for hearing. This is described in the compliance letter template.
 - i. Exit interviews are conducted within 30 days of the last day of the inspection.
 - j. On the general checklist. Email of issues accompanies exit interview. The email documents issues found during the inspection.

8	(Incident Investigations) Were all federally reportable incidents investigated, thoroughly documented, with conclusions and recommendations? Yes = 10 No = 0 Needs Improvement = 1-9	10	10
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- 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:

There were two incidents in Minnesota in 2021. Northern State Power incident resulted in 23 violations. 15 violations have been resolved to data. The incident letter is used to report and document investigation finding. An investigation checklist is also used to document information. Great Plains also had an excavation damage incident which resulted from a leak survey and no violations.

- a. Inspectors are on call weekly. They receive notification from the State duty officer. The On call person is expected to go out if there is a PHMSA notification.
- b. Yes, incident case files contain e-mails, photos, and the investigation checklist.
- c. The investigation Checklist is filled out for all state and federal reportable incident. No go justification is documented in the investigation checklist.
- d. Observations are addressed on the checklist
- e. Contributing factors are addressed in the investigation checklist.
- f. Recommendations are addressed in the investigation checklist.
- g. Compliance actions were initiated for the Centerpoint LNG incident. This case has not been closed yet. The are interpretations that are to be developed and requested for this case.
- h. AID has not requested assistance from Minnesota. There are two AID inspectors in Minnesota
- i. Lessons learned are presented at regional NAPSIR meetings , damage prevention meetings and seminars.

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	1	1
	Yes = 1 No = 0 Needs Improvement = .5		

Evaluator Notes:

There were no deficiencies found last year. No response was required.

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

Evaluator Notes:

The last seminar was conducted on April 2022. The previous seminar was conducted on April 2021. Minnesota strives to do a seminar every year. The seminar combines liquid and gas operators.

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

Evaluator Notes:

Transmission mapping is addressed on IA questions. A staff GIS person also keeps track of this information.

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

Evaluator Notes:

The Minnesota web page contains one call information, national mapping system, PHMSA links, alert notices, telephonic notices, contact information, forms, regulations, MNOPS annual report . Minnesota does a holiday mailing with key information. Enforcement information is available to the public through the web page.

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

Evaluator Notes:

An engineer is assigned to ensure the safety related conditions are processed appropriately. The Centerpoint overpressure event resulted in a pilot being replaced. This action was deemed appropriate by the inspector A case closure letter goes out

to operator. Central region closed out WMS since this was an interstate operator. A second SRC was the result of an immediate repair with a pressure reduction. The appropriate repair was made. WMS was closed.

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

- a. Jon regularly responds to NAPSR surveys.
- b. All WMS activities were closed. Elizabeth monitors WMS.

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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 |
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Evaluator Notes:

The 2/14/2019 Waiver for the Metro Beltline pipeline was replaced and closed out. Work on the Centerpoint waiver was extended to 12/31/21 and completed. The was sent to PHMSA in February for closure.

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| 16 | Were pipeline program files well-organized and accessible?
Info Only = No Points | Info Only | Info Only |
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Evaluator Notes:

Minnesota uses the Sales Force data base. Information was readily available and accessible.

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| 17 | Discussion with State on accuracy of inspection day information submitted into State Inspection Day Calculation Tool (SICT). Has the state updated SICT data?
Yes = 3 No = 0 Needs Improvement = 1-2 | 3 | 3 |
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Evaluator Notes:

Minnesota had 721 day as calculated by SICT. There were no peer review comments. Minnesota had 971 actual inspection days.

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

Damages per 1000 tickets has been trending slightly downward to about 2.2 damages per 1000 tickets. Inspection days per 1,000 miles has trended downward. It had been trending up the last five years until 2020. Inspections days per mm/LPG unit appeared to be trending up until 2020. % core trained inspectors has trended up along with % additional training and % 5 year retention. Total leaks eliminated/repaired is trending downward. Enforcement and investigation scores have be maxed out at 100%.

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| 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 = No Points
a. https://pipelinesms.org/
b. Reference AGA recommendation to members May 20, 2019 | Info Only | Info Only |
|-----------|--|-----------|-----------|

Evaluator Notes:

Safety Management requirements have been put in compliance orders. SMS has also been seminar topic in past.

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| 20 | General Comments:
Info Only = No Points | Info Only | Info Only |
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Evaluator Notes:

The only issue found in this part was late inspection intervals for two drug and alcohol inspections.

Total points scored for this section: 49
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 Info Only Info Only comments box below)

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:

- Field Activity was observed for two standard inspections. Minnesota Energy Resources Corporation is a Local Distribution Company. Northern Natural gas is an interstate transmission company.
- Minnesota Energy Resources Corporation was last inspected last year. Northern Natural gas inspection intervals are established by Central Region.
- Pipeline personnel was present at both inspections.
- Minnesota Energy Resources Corporation was inspected by John Sogard. John has 7 years of experience. Northern Natural gas was inspected by Thomas Coffman who has 7 years experience and Tricia Montbriand has 1 and 1/2 years of experience.

- 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:

Both inspectors used IA in their field tablets.

- 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:

- The two inspections were the field portion of standard inspections. Activities performed by inspectors were appropriate.
- Procedures were used to support OQ protocol 9 observations
 - Records were reviewed during the records portion of the inspection.
 - Field activities included review of corrosion control measures, markers, meter sets, regulator stations, farm taps, valves, MAOP and construction activity.
 - Damage prevention locate was observed
 - The inspections were an appropriate length.

- 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:

Inspectors wore proper PPE and conducted the inspection in a safe manner. Inspectors asked good questions and had good rapport with the operators.

- 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:

Exit interviews are to be conducted after the inspection. A summary of days activities was provided by an inspector.

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:

- a. Inspectors performed inspections wearing the proper PPE and conducted the inspection in a safe manner.
 - b. Inspectors inspected markers. sign phone numbers, farm taps, regulator stations, meter sets, and corrosion control measures.
 - c-d A locator request was observed.
-

7 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

There were no issues with Part E.

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

- | | | | |
|---|--|---|---|
| 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:

Annual reports reviews are performed. Data is entered into the Sales Force data base. The assigned inspector is required to perform the annual report review. Jon takes information from the data base to incorporate into the risk analysis.

- | | | | |
|---|--|---|---|
| 2 | Has the state verified that the operators analyze excavation damages for the purpose of determining root causes and minimizing the possibility of a recurrence? (192.617)
Has the state verified that the operators have appropriately identified excavators who have repeatedly violated one-call laws and damaged their facilities. Have the operators taken steps to mitigate that risks? (192.1007)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Operators are required to submit quarterly damage prevention reports. 168 cases were investigated last year. QA/QC is required if conditions dictate that work is needed.

- | | | | |
|---|---|---|---|
| 3 | Has the state reviewed the operator's annual report pertaining to Part D - Excavation Damage?
Yes = 4 No = 0 Needs Improvement = 1-3 <ol style="list-style-type: none">a. Is the information complete and accurate with root cause numbers?b. Has the state evaluated the causes for the damages listed under "One-Call Notification Practices Not Sufficient" (Part D.1.a.)?c. Has the state evaluated the causes for the damages listed under "Locating Practices Not Sufficient" (Part D.1.b)? For each operator, does the state review the following?d. Is the operator or its locating contractor(s) qualified and following written procedures for locating and marking facilities?e. Is the operator appropriately requalifying locators to address performance deficiencies?f. What is the number of damages resulting from mismarks?g. What is the number of damages resulting from not locating within time requirements (no-shows)?h. Is the operator appropriately addressing discovered mapping errors resulting in excavation damages?i. Are mapping corrections timely and according to written procedures?j. Has the state evaluated the causes for the damages listed under "Excavation Practices Not Sufficient" (Part D.1.c.)? | 4 | 4 |
|---|---|---|---|

Evaluator Notes:

Annual report information is reviewed annually.

a. Information is reviewed during Damage prevention audits. These inspections are performed at 5 year intervals. A state form is used for this inspection.

b-c. The state does not see much of the "practices not sufficient category."

d-j. These issues are looked at during the damage prevention audit.

- | | | | |
|---|--|---|---|
| 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 state tabulates information for pipeline operators.

a. Excavators are responsible for the most pipeline damage.

b. The state performs operator training on damage prevention. This is covered in PA and also addressed in the damage prevention checklist.

c-d. This is done during the damage prevention audit.

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

There are no issues with part F.

Total points scored for this section: 10
Total possible points for this section: 10



PART G - Interstate Agent/Agreement States

Points(MAX) Score

- 1 Were all inspections of interstate pipelines conducted using the Inspection Assistant program for documenting inspections? Info Only Info Only
Info Only = No Points

Evaluator Notes:

Inspection Assistant is used to document all interstate inspections.

- 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:

Yes, notices are provided within 60 days, Minnesota works with the regions when there are violations. There were no violations last year. The last violation was in 2019.

- 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:

If an immediate concern materialized, Minnesota would immediately notify PHMSA. None of these types of conditions have occurred.

- 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:

Minnesota will coordinate with PHMSA on anomaly digs.

- 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:

Minnesota works with AID and coordinate with them on interstate incidents.

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

Evaluator Notes:

There were no issues with Part G.

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