



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

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 Hazardous Liquid State Program Evaluation -- CY 2021
Hazardous Liquid

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 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

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
- 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:

- Liquids program has 2 refined product lines(2 units), 1 crude oil line (1 unit), 4 interstate product lines (5 units), 5 interstate crude lines (6 units) and 2 HVL lines (3 units) Data is collected from the sales forces data base.
- There were 302 actual inspection days. There were 12 SICT days. There was a major Enbridge construction project which resulted in a most of the inspection days. Numbers are collected from dual timesheets.
- All operators on random pipe list for 2021 were listed on attachment 3. Attachment 3 lists 4 units for HVLs, attachment 1 lists 3 units. An ammonia line was taken out of service. Attachment 3 will be corrected in 2022.
- There were two Hazardous Liquid interstate incidents listed in WMS and the progress report.
- Carry over for 2020 corresponds to the 2021 progress report. Numbers are derived from the sales force data base.
- Minnesota uses the salesforce data base. Information was readily available.
- Progress report data correlated with T&Q's blackboard system.
- All amendments' were adopted and up to date.
- Minnesota hosted a seminar, regulation reform alert notice was issued, damage prevention partnerships were developed.

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



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

Pre inspection procedures are addressed in section 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. IMP 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.

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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 4.1.1

a-e. List of risk assessment criteria is identified in section 4.1.1.

f. Units appear to be broken down appropriately.

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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.. Opportunities for hearing are addressed in section 5.3.2.2. Civil penalties are addressed in section 5.3.2.5.

- 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.
- b. Follow up activity is addressed in section 5.3.1.
- c. Closing violations is addressed in section 5.3.1.(3)

4	(Incident/Accident Investigations) Does the state have written procedures to address state actions in the event of an incident/accident?	3	3
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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:

Procedure 6.1 mentions the FIR and addresses observations, contributing factors and recommendations. These have been added to state investigation forms.

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

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

Evaluator Notes:

There were 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 |
| | <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:

Yes, review of inspection reports showed that inspections were performed by qualified personnel. Liquid Core qualified personnel are Jeff Blackwell, Thomas Chrisfield, Thomas Coffman. Joseph Hauger, Estelle Hickman, Michael Memidiola, Olaf Engebretson, Adam Retzlaff, Elizebeth Skalne, Jon Sogard, Todd Stansbury and Jonathan Wolfgram.

a. OQ Qualified inspectors are Jeff Blackwell, Thomas Chrisfield, Thomas Coffman, Patrick Donavan, Joseph Hauger, Michael Menidiola, Olaf Engebretson, Adam Retzlaff, Elizebeth Skalne, Jon Sogard, Todd Stansbury, Jonathan Wolfgram.

b. Liquid IMP qualified personnel are Jeff Blackwell, Thomas Coffman, Joseph Hauger, Michael Menidiola, Olaf Engebretson, Adam Retzlaff, Elizebeth Skalne, Todd Stansbury and Jonathan Wolfgram.

c. Root cause trained personnel are Jeff Blackwell Joseph Hauger, Michael Mendiola, Olaf Engebretson, Adam Retzlaff, Elizebeth Skalne, Jon Sogard, Todd Stansbury and Jonathan Wolfgram.

Failure investigation qualified personnel are Jeff Blackwell, Thomas Chrisfield, Thomas Coffman. Patrick Donavan, Joseph Hauger, Estelle Hickman, Michael Menidiola, Olaf Engebretson, Adam Retzlaff, Elizebeth Skalne, Jon Sogard, Todd Stansbury and Jonathan Wolfgram.

d. No Liquids outside training was completed in 2021.

e. Inspectors are required to meet criteria in the probation checklist before they can be qualified to perform inspections.

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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:

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 joined the Minnesota program 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 issues with Part C.

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:

Inspection intervals for all operators on the random inspection list were reviewed and found to be within the required timeframes.

- a. Standard inspection were found to be within required time intervals.
- b. Public Awareness inspections were found to be within required time intervals.
- c. Drug and Alcohol inspections were found to be within required time intervals.
- d. Control Room Management inspections were found to be within required time intervals.
- e. Minnesota construction days exceeded 20% for liquid operators though this is not required.
- f. Operator Qualifications were found to be within required time intervals.
- g. Integrity Management inspections were found to be within required time intervals.

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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:

IA is used for inspection work. Forms were filled out appropriately . All fields were checked with an explanation. The lead inspector was qualified.

- 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 management inspections
- e. A state form is used for construction inspections.
- f. IA is used for Operator Qualification inspections.
- g. IA is used for Integrity Management 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 Part 195 Subpart G
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

Operator Qualification inspections are within the required time interval. Protocol 9 was included in inspection reports.

- 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 2 2
- Yes = 2 No = 0 Needs Improvement = 1
- 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:

Integrity Management Program inspections were within the required inspection intervals. Intrastate liquid operator are smaller operators. Interstate operators are the larger operators.

- 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:

A Request for information was sent to operators. The request includes notification of advisory bulletins. This was last done last year in 2021. Marathon and Flint (the intrastate liquid operators) responded to the information request.

- 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:

There were no liquid advisory bulletins in 2021.

- 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:

There were no compliance issues or actions taken on intrastate liquid operators in 2021.

a. Compliance letters go to the chief executive officer. No compliance issues were found in 2021.

b. There were no probable violations found in 2021.

c. There were no probable violations found in 2021.

- d. Five follow up probable violations from 2020 were corrected in 2021.
- e. There were no violation found in 2021.
- f. Marathon was fined in 2017, Flint was penalized in 2020.
- g. Jon signs all compliance letters. The letters are also reviewed by the inspectors direct supervisor.
- h. They would have the opportunity for due process but did not need it in 2021.
- i. Exit interviews were conducted within 30 days.
- j. Written notice of probable violations is provided during the exit interview. There were no probable violation found in 2021.

e.

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:

Minnesota provides what Central Region asks for when the incident is an interstate incident. Enbridge had a leak from a flange gasket. An email response from the operator was adequate for region. This investigation was done virtually. Enbridge also had a corrosion leak which was investigated remotely. Typically MNOPS (Minnesota Office of Pipeline Safety) gets permission from AID to go out for interstate incidents.

- a. Inspectors are on call on a weekly basis. They receive notification from the state duty officer. The on call person is required to go out when there is a federally reportable incident.
- b. Yes, the case file includes emails, photos, and incident checklist
- c. No go decisions are justified in the investigation checklist.
- d. Onsite observations are found on incident checklist.
- e. Contributing factors are found in the investigation checklist.
- f. Recommendations are found in the inspection checklist.
- g. No compliance issues were found for the two incidents.
- h. There were no request from PHMSA this year, they have two AID investigators in state.
- i. Lesson learned are shared at the NAPS regional meeting, damage prevention meeting and state seminar

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:

John Harrington is the Commissioner of Public Safety. There were no issues in the 2020 evaluation. A response was not 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 April 2022. The prior seminar was in April 2021. Minnesota combines gas and liquid seminars and tries to do seminar every year.

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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:

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

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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:

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

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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:

There were no liquid SRC's in 2021.

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

- a. Jon responds to most NAPSRS survey requests.
- b. All WMS activities were closed. Elizabeth Skalneke monitors WMS activity.

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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:

There are no liquid waivers.

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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:

Most information is maintained in the Sales Force data base. The information appeared complete and was readily 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:

There were 12 SICT days in 2021. Minnesota had 302 inspection days. Most of these days were attributed to the Enbridge Construction project. There were no peer review comments on Minnesota's SICT submission.

- 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:

Liquid days per 1000 miles of pipe have been trending down since 2016. % core qualified inspectors went down in 2020. % additional training and % 5 year retention has been trending up since 2013. Liquid enforcement and investigation score has maintained a consistent 100 % score.

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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 Info Only
Info Only = No Points

- a. <https://pipelinesms.org/>
b. Reference AGA recommendation to members May 20, 2019

Evaluator Notes:

Minnesota has added SMS requirements to enforcement orders. SMS has also been a topic at safety seminars. It has also been a topic to address when Minnesota submits "Requests for Information."

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

Evaluator Notes:

There were no issues with Part D.

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:

- Witnessed an anomaly dig inspection.
- N/A, There are no time interval requirements with anomaly dig inspections.
- Operator was present.
- Joe Hauger had 8 years of experience with the program.

- 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:

Joe used IA on an ipad to document 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:

The inspection consisted of a field, records and procedure review.

- Repair, weld and coating procedures were reviewed.
- ILI correlation data was requested, welder, NDT qualifications and dig sheets were reviewed.
- Inspector noted dig construction, defect characteristics, and NDT activity.
- N/A, No other type of activity noted.
- Inspection lasted until early afternoon. Welders were to get on-site the next day. No work remaining until welders get on site. Inspector time on site was appropriate.

- 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:

Joe had adequate knowledge of program and regulations. He inspected the right things, asked good questions and follow up questions.

- 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:

An exit interview was conducted at the end of the day. There was some follow up material which was requested.

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. Joe wore the appropriate PPE and followed Agency policy of not going in the ditch.
- b. Joe observed the NDT work, weld, coating procedures, He followed up on anomaly/dig correlation. He asked about other threats, SCC and seam issues.
- c. Joe looked into coating procedures. This is an important but not common item reviewed by inspectors.
- d. Joe requested information to follow up on any sizing correlations which may be required.

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

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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 |
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Evaluator Notes:

Annual reports reviews are performed. Annual Report Data is entered in Sales Force Data Base. Inspectors are required to perform annual report and incident reviews. Jon takes information to incorporate in risk analysis.

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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:

Operators are required to submit quarterly damage prevention report. 168 damage prevention cases were investigated last year. Minnesota requires QA/QC from the operator if conditions dictate that work is needed.

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

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 during this inspection.

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

d-j. These issues are looked 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
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? | 2 | 2 |
|---|---|---|---|

- 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.
- 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 on 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 an is also addressed in the damage prevention audit 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 were no issues with Part F.

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:

Inspection Assistant is used for 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.

- 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 arises, Minnesota will immediately contact PHMSA. None of these of conditions have ever 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 coordinates 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 to coordinate 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