



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

Oklahoma Corporation Commission

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: Oklahoma

Agency Status:

Date of Visit: 04/12/2022 - 04/15/2022

Agency Representative: Dennis Fothergill, Kelly Phelps, John Harper

PHMSA Representative: Joe Subsits

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

Name/Title: Dana Murphy, Chair

Agency: Oklahoma Corporation Commission

Address: PO Box 52000

City/State/Zip: Oklahoma City, Oklahoma 73152-2000

Rating:

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

INSTRUCTIONS:

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

Scoring Summary

PARTS

Possible Points Points Scored

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

0
15
10
50
15
10
0

0
15
10
50
15
10
0

TOTALS

100 100

State Rating **100.0**

PART A - Progress Report and Program Documentation Review

Points(MAX) Score

- 1 Were the following Progress Report Items accurate? (*items not scored on progress report) Info Only Info Only
Info Only = No Points
- a. Stats On Operators Data - Progress Report Attachment 1
 - b. State Inspection Activity Data - Progress Report Attachment 2
 - c. List of Operators Data - Progress Report Attachment 3*
 - d. Incidents/Accidents Data - Progress Report Attachment 4*
 - e. Stats of Compliance Actions Data - Progress Report Attachment 5*
 - f. List of Records Kept Data - Progress Report Attachment 6 *
 - g. Staff and TQ Training Data - Progress Report Attachment 7
 - h. Compliance with Federal Regulations Data - Progress Report Attachment 8
 - i. Performance and Damage Prevention Question Data - Progress Report Attachment 10*

Evaluator Notes:

- a. There are 17 private, 54 municipal, 89 master meters, 55 transmission, 39 gathering identified in the Progress Report. The Progress report operator numbers match the PIPES data base.
- b. There were 1465 days inspection days. 342 of those days were construction days. This equated to 23% construction days. Inspection days match the OCC data base.
- c. Checked operators from the random operator list to see if they were listed on attachment 3. Semas is no longer jurisdictional. Colonial resources is no longer jurisdictional. This issue is resolved.
- d. Progress report matched the Pipeline Safety Data mart. 1 gas incident was reported in 2021.
- e. The number of probable violation correctly carries over from previous year. Compliance numbers come from the PIPES database.
- f. Records were readily retrievable during the audit. A hard copy of the records is still maintained.
- g. Training records correlated to SEBA. Gas, liquids and underground storage add up to 100 % for each person.
- h. Federal regulations are adopted within 2 years of effective date.
- i. There was a reduction in hits per 1000 locates. For 2022. OCC corporation will continues to improve on management of excavation damage information. The commission is also continuing to convert paper to digital files. They also intend to improve electronically available information to the public.

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, inspection and post inspection procedures are on page 6. Risk priority is mentioned on page 7. OCC requires a portion large operators to be inspected annually on page 7. The Commission also places inspection priority on systems with lower pipeline expertise such as master meters and municipal systems on page 7. Problem operator also can be subject to a higher inspection frequency as stated on page 11. Inspection forms to be used are mentioned in the General Provisions section on page 14." Page 14 states current Federal inspection forms or equivalent form are to be used.

- a. Standard inspections are addressed on page 4. Drug/Alcohol, public Awareness and CRM inspections are addressed on page 4 and 5.
- b. TIMP and DIMP inspections are addressed on page 5. Page 10 requires annual review of integrity management implementation of the largest liquid and gas operators. DIMP is addressed on page 11.
- c. OQ inspections are covered on pages 8-9.
- d. Damage prevention inspections are addressed on page 5 of the procedures.
- e. on-site training is covered on page 15.
- f. Construction inspections are scheduled on page 4.
- g. There is no LNG in Oklahoma.

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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 priorities are mentioned on page 7 - 11 of the procedures. OCC requires large operator to have a portion of their system to be inspected annually on page 7. The Commission also places inspection priority on systems with lower pipeline expertise such as master meters and municipal systems on page 7. Problem operator also can be subject to a higher inspection frequency as stated on page 11. Inspection form to be used are mentioned in the General Provisions section on page 14.

- a-e Prioritization considerations are addressed on page 12.
- f. Inspection units are 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 on page 13-14. Contempt hearings are mentioned on page 4. The hearing will be used to address non compliance issues. Civil penalties are addressed on page 15.

- a. Finalization of inspection results is required within 90 days as addressed on page 13. Requirements to conduct exit interview before 30 days is on page 6. Page 14 states that letters will be submitted to appropriate officials.
- b. Annual review of long term compliance issues is found on page 15.
- c. Conditions for close out are addressed on page 14-15.

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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:

Telephonic notifications caused by equipment failures which result in hospitalization, death or fire will use the Federal incident /accident form.

- a. Taking incident calls is addressed on page 11. Page 11 of procedure addresses when telephonic investigations are performed.
- b. The inspector always goes on-site if there is a federally reportable incident. This is addressed on Page 12.

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

Evaluator Notes:

Procedures are condense but address the key elements required by the start guidelines. No issues were found.

Total points scored for this section: 15
Total possible points for this section: 15



PART C - State Qualifications

Points(MAX) Score

- | | | | |
|---|---|---|---|
| 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 DIMP/IMP Training before conducting inspection as leadc. Completion of Required LNG Training before conducting inspection as leadd. Root Cause Training by at least one inspector/program managere. Note any outside training completedf. 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:

Personnel training records are tracked using T&Q blackboard. New personnel are mentored and ride with experienced inspectors until they are trained.

- a.) Inspectors qualified to conduct OQ training inspections are Bruce Cambell, Vince Eitzen, John Harper, Chad Holiday, Randy Kirkegard, Rick Mathews, Dustin Merriman, Jeff Overbay, Kelly Phelps, Mitchel Skinner, Ron Smith, Randy Snyder and Don Taxton
- b.) Inspector that are Gas IMP qualified are Steven Bibb, Bruce Cambell, Vince Eitzen, Dennis Fothergill, John Harper, Chad Holiday, Randy Kirkegard, Rick Mathews, Dustin Merriman, Jeff Overbay, Kelly Phelps, Mitchel Skinner, Ron Smith, Randy Snyder and Don Taxton.
- c.) There is no LNG in Oklahoma
- d.) Root cause training has been taken by Bruce Cambell, Vince Eitzen, John Harper, Chad Holiday, Randy Kirkegard, Rick Mathews, Dustin Merriman, Jeff Overbay, Mitchel Skinner, Ron Smith, Randy Snyder and Don Taxton
- e.) No outside training was noted in 2021
- f.) The following inspectors completed their core classes: Steven Bibb, Bruce Cambell, Vince Eitzen, Dennis Fothergill, John Harper, Chad Holiday, Randy Kirkegard, Rick Mathews, Dustin Merriman, Jeff Overbay, Kelly Phelps, Kelly Phelps, Mitchel Skinner, Ron Smith, Randy Snyder and Don Taxton All inspectors were qualified except for Chance Nestil and Billy Anglin are gas core qualified. Mike Bales, and Brandon Lee are new hires. No issues were noted. New engineers work with experienced personnel during training period.

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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:

Dennis Fothergill is qualified to do the core inspection work. He has been the with the pipeline safety program for 35 years. He has a good understanding of pipeline safety issues. No issues were noted

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| 3 | General Comments:
Info Only = No Points | Info Only | Info Only |
|---|--|-----------|-----------|

Evaluator Notes:

State guidelines met. No issues were noted.

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

PART D - Program Performance**Points(MAX) Score**

- | | | | |
|----------|--|---|---|
| 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 <ul style="list-style-type: none">a. Standard (General Code Compliance)b. Public Awareness Effectiveness Reviewsc. Drug and Alcohold. Control Room Managemente. Part 193 LNG Inspectionsf. 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) | 5 | 5 |
|----------|--|---|---|

Evaluator Notes:

a-h All operators on the random inspection list were evaluated. 2021 inspection reports were reviewed for these operators. Dates for all inspection types were also evaluated. All inspections were performed within 5 years as stated in the procedures. Most inspections were done within 3 years. There is No LNG in Oklahoma. 23% of inspection days were construction days.

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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 <ul style="list-style-type: none">a. Standard (General Code Compliance)b. Public Awareness Effectiveness Reviewsc. Drug and Alcohold. Control Room Managemente. Part 193 LNG Inspectionsf. Constructiong. OQ (see Question 3 for additional requirements)h. IMP/DIMP (see Question 4 for additional requirements) | 10 | 10 |
|----------|--|----|----|

Evaluator Notes:

OCC Uses a modified PHMSA form for standard inspections in 2021. The IA equivalent is used for programmatic inspections. OCC is planning to Switch to IA in 2022. 2021 inspection forms were reviewed and filled out adequately.

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

Evaluator Notes:

Programmatic OQ inspections are done in three year intervals. Protocol 9 was checked for selected inspections and found to be OK.

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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 and DiMP inspections were conducted at required frequencies. The IA equivalent form is used.

- a. The largest operators receive an annual review which provides a HCA management and implementation review. These reviews are tracked by John Harper. Largest operator's are determined by operator mileage.
- b. This issue is addressed in IA considerations. The consideration addresses inquiry into Adyl-A and problematic plastics.
- c. An e-mail was sent to Oklahoma Natural Gas to confirm that the low pressure systems are evaluated as a DIMP threat. The letter was sent in September 1, 2020.

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	2	2
	<ol 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?		

Evaluator Notes:

The state addressed NTSB recommendations as follows:

- a. There is no cast iron in Oklahoma
- b. There is no cast iron in Oklahoma
- c. Procedures to address multiple leaks adjacent to nearby buildings is addressed as an addendum question on the States checklist
- d. 192.617 is addressed during accidents investigations
- e. Directional bore damage prevention procedures are addressed as addendum questions on the State checklist
- f. Low pressure distribution recommendation was addressed by a mailing the bulletin to operators
- g. A letter with the bulletin was also sent to operators to inform operators about precautions to consider for indoor regulators.

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:

The only advisory bulletin that was released in 2021 was the bulletin that addressed minimization of gas releases. A letter went out to operators informing them of the advisory bulletin on 1/6/2022.

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
	<ol style="list-style-type: none">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:

A review of 2021 inspection documentation appeared to show that compliance procedures were followed.

- a. Compliance letters are sent to the appropriate chief official
- b. Probable violations were documented properly
- c. Probable violations appeared to be resolved properly. Golden Gas services had 27 violations and some additional follow up is still required on this project
- d. Violations are tracked on the PIPES system which allow open violations to be tracked
- e. There were compliance actions for all identified violations
- f. This year the Commission issued a penalty for not inspecting the inside of an opened pipe
- g. Supervisors provide oversight of the inspectors compliance work. Violations are tracked on the PIPES system. Letters are ultimately signed and approved by Dennis.
- h. There is a show cause hearing process
- i. Exit interviews are conducted within within a week meeting the 30 day requirement
- J. Finding letter have gone out within a month meeting the 90 day requirement

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

- a. Does state have adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports?
- b. Did state keep adequate records of Incident/Accident notifications received?
- c. If onsite investigation was not made, did the state obtain sufficient information from the operator and/or by means to determine the facts to support the decision not to go on site?
- d. Were onsite observations documented?
- e. Were contributing factors documented?
- f. Were recommendations to prevent recurrences, where appropriate, documented?
- g. Did state initiate compliance action for any violations found during any incident/accident investigation?
- h. Did state assist Region Office or Accident Investigation Division (AID) by taking appropriate follow-up actions related to the operator incident reports to ensure accuracy and final report has been received by PHMSA?
- i. Does state share any lessons learned from incidents/accidents?

Evaluator Notes:

All Federally reportable incidents are investigated. There was one federally reportable gas incident in Oklahoma. This was an incorrect operation incident by Oneok on 1/27/21.

- a. An inspector is assigned to serve 24 hour on call duty to receive incident notifications. Kelly is notified when the Federal Threshold is met.
- b. A record is maintained of all notifications
- c. An onsite investigation was made of the Oneok incident.
- d. Form 11 was used to document this incident
- e. Form 11 was used to document this incident
- f. There were no compliance issue or recommendations associated with this incident
- g. There were no compliance issues associated with this investigation

- h. There were no instances of providing assistance to any AID investigations last year
i. Lessons learned from the investigations is shared at the NAPSR southwest Region Meeting

- 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:

The 10/2/21 letter to Ms. Dana Murphy did not require a response since there were no issues. Ms. Murphy is still the chair.

- 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:

A seminar was conducted in 2028. A seminar was scheduled in 2021. The seminar was cancelled due to lack of interest to travel from operators due to covid. The seminar has been rescheduled for November 2022.

- 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:

NPMS updates are addressed in the transmission checklist. John Harper also tracks this activity on a spreadsheet. The spreadsheet identifies the tracking status of mapping notices. John also call Washington DC to confirm that notices have been made. All 2021 notices have been made.

- 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 Commission communicates with stakeholders through the web page. The web page has a complaint and question form, regulations, and contact information. Staff also does e-mail blasts when important information needs to be disseminated.

- 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:

There were no safety related conditions in 2021. This was confirmed in WMS.

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

Evaluator Notes:

- a. The Commission responds to NAPSR surveys. Typically Dennis seeks input from field personnel prior to filling out the survey monkey.
b. John Harper periodically checks IMP notifications. All 2021 activities were closed in WMS. All in WMS activities were failure investigations.

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

Evaluator Notes:

No waivers were issued by OCC.

16 Were pipeline program files well-organized and accessible?

Info Only Info Only

Info Only = No Points

Evaluator Notes:

Oklahoma had electronic files and color coded hard copy files as backup. All documentation was readily retrievable during the inspection.

17 Discussion with State on accuracy of inspection day information submitted into State Inspection Day Calculation Tool (SICT). Has the state updated SICT data?

3

3

Yes = 3 No = 0 Needs Improvement = 1-2

Evaluator Notes:

2021 SICT days for gas are 1263. There were 1465 inspection days in 2021. SICT Peer review comments noted that risk rankings and comments are incomplete. This issue is being fixed.

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

Evaluator Notes:

Gas Inspection days per 1000 miles have trended up since 2010. Numbers have held constant the last three years. Meter/LPG inspection days have been trending downward since 2010. Excavation damages per 1000 ticket is trending downward to about 2.2 hits per 1000 locates. There have been improvements on one call law and damage prevention management in 2021. Enforcement and incident investigation certification score is steady at 100%. Core training, additional training and %5 year retention have all trended upward since 2010. Total leaks eliminated/repaired per 1000 miles Have trended upward slightly. Hazardous leaks eliminated/repaired per 1000 miles has held steady at at about 115 leaks per 1000 miles. Leaks scheduled for repair at the end of the year per 1000 miles has trended downward.

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:

The Commission supports SMS is discussions in with operator. SMS is also addressed during meetings with operators. An Advisory letter on SMS went out on 11/20/2020.

20 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

No issues noted in 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:

- A standard inspection was done of Of the Oklahoma Natural gas Enid unit.
- A standard inspection of the Enid unit was conducted within 3 years
- Representative from Oklahoma Natural Gas were at the inspection
- Dustin Merriman was the OCC inspector. He has 9 years of experience with the Commission.

- 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:

Dustin used the standard IA equivalent paper form. The form was used In accordance with Commission procedures

- 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:

- Procedures were reviewed and referred to during the field inspection.
- Calibration records were checked during the field visit.
- Dustin checked equipment calibration. I was informed that an OQ protocol 9 would be done.
- The field review was adequate
- The inspection was thorough, covered key area component's and covered the entire service area in the unit.

- 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:

Dustin was qualified to inspect the operator. He had a good understanding of pipeline operations, the regulations and of local concerns. He had good questions and followed up well on the issues that came up

- 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:

We left before the end of the inspection but were assured an exit interview would be done. No violations were found during the inspection by the 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. Dustin performed the inspection in a safe manner. He wore the appropriate PPE and was aware of prevailing conditions.
- b. Dustin had relief devices tested, He had pipe to soil measurements taken on a galvanic system, He checked for atmospheric corrosion, coating condition, checked the right of way, checked equipment ID's in the field, and checked testing equipment calibration records.
- c. N/A
- d. Dustin was professional, he controlled the inspection and made sure that the service area and key component's within the service area were covered during the inspection.

7 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

No issues noted in Part D

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 are reviewed by John, Kelly and Dennis. Spreadsheets are used to track information for accuracy and trending. Information from this review are used to populate the Commission risk assessment. Semi annual reports also submitted. Amanda enters annual report information on a spreadsheet. This information is reviewed by associated inspector.

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

Evaluator Notes:

Operators are required to submit a semi annual report which includes damage prevention information. This is required in Oklahoma regulation. This is a new process and is evolving. OCC intends to hire 4 people to work on damage prevention issues. Their main purpose will be to investigate line hits. Amanda tabulates information for John to review. Cause information is taken from DIRT reports. OCC is looking to promote somebody for the damage prevention manager position. OCC investigated approximately 60 third party hits in 2021. This generated violation letters which identified poor operator practices to prevent reoccurrence. Semi annual reports were used to identify high damage prevention incident operators. 62 letters went to operators, 31 letters went to excavators. A majority of investigations generated a letter to a responsible party.

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| 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:

Reports are received semi annually. Information is consistent with annual reporting requirements. Causal factors are reviewed by Commission personnel to determine causal factors.

- a. Root cause numbers are evaluated on spreadsheet
- b. The "other" category has 8 of 1516 hits from the largest operator. The second largest operator had 124 third party hits.
- c. The "other" category has 8 of 1516 hits from the largest operator. The second largest operator had 124 third party hits.
- d-j The State did damage prevention investigations for 60 third party damage events. As a result of the investigations the state addressed violations based on their investigation results. Most investigations generated violations.

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| 4 | Has the agency or another organization within the state collected data and evaluated trends on the number of pipeline damages per 1,000 locate requests?
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

- 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.
- d. Has the state verified the operator is appropriately focusing damage prevention education and training to address the causes of excavation damages?

Evaluator Notes:

John calculated hits per 1000 information from annual report data. Data is also supplied by Okie 811.

- a. Operator/ excavator are the two largest stakeholder groups responsible for reporting. Excavators are higher.
- b. Operators participate in the one call expo and Home and garden show, Training activities have decreased the last few years because of covid. John has done presentations at these venues. Call Okie also does presentations and this group is composed of pipeline operators.
- c. The State did approximately 60 damage prevention investigations resulting in 40 violation letters. There were 22 operator violations and 18 excavator violations.
- d. Operators are regulated to comply with the public awareness programs. These programs are evaluated by state.

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

There were no issues in 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:

The Oklahoma Corporation Commission is not an interstate agent and does not have a 60106 agreement with PHMSA.

- 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:

The Oklahoma Corporation Commission is not an interstate agent and does not have a 60106 agreement with PHMSA.

- 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:

The Oklahoma Corporation Commission is not an interstate agent and does not have a 60106 agreement with PHMSA.

- 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:

The Oklahoma Corporation Commission is not an interstate agent and does not have a 60106 agreement with PHMSA.

- 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:

The Oklahoma Corporation Commission is not an interstate agent and does not have a 60106 agreement with PHMSA.

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

Evaluator Notes:

The Oklahoma Corporation Commission is not an interstate agent and does not have a 60106 agreement with PHMSA.

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