



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

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 Hazardous Liquid State Program Evaluation -- CY 2021  
Hazardous Liquid

**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

**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**

<b>PARTS</b>	<b>Possible Points</b>	<b>Points Scored</b>
A Progress Report and Program Documentation Review	0	0
B Program Inspection Procedures	15	15
C State Qualifications	10	10
D Program Performance	50	50
E Field Inspections	15	15
F Damage prevention and Annual report analysis	6	6
G Interstate Agent/Agreement States	0	0
<b>TOTALS</b>	<b>96</b>	<b>96</b>
<b>State Rating</b> .....		<b>100.0</b>



# 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. Progress report numbers match numbers from PIPES data base. There is 1 refined product line, 21 crude systems, 9 HVL systems and 1 CO2 system.
- b. Progress reports matched PIPES liquid inspection day count of 333 inspection days.
- c. Attachment 1 numbers matched attachment 3. The random operator list for 2022 did not match attachment 3. Lumen Midstream was bought by Blue Mountain in 2019, Rose Rock Midstream was abandoned in 2017 and Kingfisher Midstream was abandoned in 2020. This issue was resolved.
- d. The progress report incident reports matched Pipeline Safety Data Mart. 30 day reports were submitted for each incident except Keyera which had a .1 bbl release. A thirty day report is not required for this incident.
- e. Compliance data on the progress report adds up properly including the correct amount of carry over compliance actions from 2020.
- f. Records were readily retrievable from the PIPES data base. The state also has hard copies of records.
- g. SEBA data matched progress report information. Percent effort in program equals 100% when you add gas, liquid and underground storage times.
- h. Federal regulations are adopted within two years of the effective date of the federal regulation.
- i. There was a reduction in third party hits per 1000 locate requests. The commission is working on converting paper files to electronic files. There is also a move to make more information available electronically to the public.

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



- |          |  |          |          |
|----------|--|----------|----------|
| <b>1</b> | Do written procedures address pre-inspection, inspection and post inspection activities for each of the following inspection types: Chapter 5.1<br>Yes = 5 No = 0 Needs Improvement = 1-4  | <b>5</b> | <b>5</b> |
|          | <ul style="list-style-type: none"> <li>a. Standard Inspections, which include Drug/Alcohol, CRM and Public Awareness Effectiveness Inspections</li> <li>b. IMP Inspections</li> <li>c. OQ Inspections</li> <li>d. Damage Prevention Inspections</li> <li>e. On-Site Operator Training</li> <li>f. Construction Inspections (annual efforts)</li> </ul> |          |          |

**Evaluator Notes:**

- Pre-inspection, inspection and post inspection procedures are addressed on page 6.
- a. Standard inspections are addressed on page 4. Drug/Alcohol, public Awareness and CRM inspections are addressed on page 4 and 5.
- b. IMP inspections are addressed on page 5. Page 10 requires annual review of integrity management implementation results of the largest liquid operators.
- c. OQ inspections are covered on pages 8-9.
- d. Damage prevention inspections are addressed on page 5 of the procedure.
- e. On-site training is covered on page 15.
- f. Construction inspections are scheduled on page 4.

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|----------|--|----------|----------|
| <b>2</b> | 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<br>Yes = 4 No = 0 Needs Improvement = 1-3   | <b>4</b> | <b>4</b> |
|          | <ul style="list-style-type: none"> <li>a. Length of time since last inspection</li> <li>b. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities)</li> <li>c. Type of activity being undertaken by operators (i.e. construction)</li> <li>d. Locations of operator's inspection units being inspected - (HCA's, Geographic area, Population Centers, etc.)</li> <li>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)</li> <li>f. Are inspection units broken down appropriately?</li> </ul> |          |          |

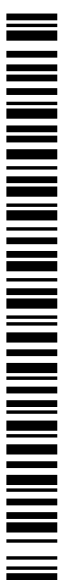
**Evaluator Notes:**

- 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. The inspection form to be used is 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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|----------|---|----------|----------|
| <b>3</b> | (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<br>Yes = 3 No = 0 Needs Improvement = 1-2  | <b>3</b> | <b>3</b> |
|          | <ul style="list-style-type: none"> <li>a. Procedures to notify an operator (company officer) when a noncompliance is identified</li> <li>b. Procedures to routinely review progress of compliance actions to prevent delays or breakdowns</li> <li>c. Procedures regarding closing outstanding probable violations</li> </ul> |          |          |

**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. 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.



- 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:

Accident incident investigations are addressed on page 12, 17 and 18.

- a. Taking incident calls is addressed on page 11.
- b. Inspectors will always go on-site for federally reportable incidents page 12.

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

Evaluator Notes:

Procedures are condense but addressed key elements required by state guidelines. No issues found.

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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 **5 5**  
 Yes = 5 No = 0 Needs Improvement = 1-4
- a. Completion of Required OQ Training before conducting inspection as lead
  - b. Completion of Required IMP Training before conducting inspection as lead
  - c. Root Cause Training by at least one inspector/program manager
  - d. Note any outside training completed
  - e. 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 TQ blackboard. New personnel are mentored and ride with experienced inspectors until they are trained.

- a. Inspectors qualified to conduct OQ training 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 and Liquid 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. 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
- d. There was no outside training offered this past year.
- e. All liquid inspections are conducted by Vince Eitzen or Ron Smith. Ron is retiring at he end of April. OCC managers stated that there is enough liquid qualified staff to cover for Ron's departure.

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

**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

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

**Evaluator Notes:**

No issues noted. State guidelines were met.

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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- |          |  |   |   |
|----------|--|---|---|
| <b>1</b> | Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1<br>Yes = 5 No = 0 Needs Improvement = 1-4   | 5 | 5 |
|          | <ul style="list-style-type: none"><li>a. Standard (General Code Compliance)</li><li>b. Public Awareness Effectiveness Reviews</li><li>c. Drug and Alcohol</li><li>d. Control Room Management</li><li>e. Construction (did state achieve 20% of total inspection person-days?)</li><li>f. OQ (see Question 3 for additional requirements)</li><li>g. IMP (see Question 4 for additional requirements)</li></ul> |   |   |

**Evaluator Notes:**

a-g All operators on random inspection sheet for 2022 were checked. All inspections done within 5 years. Most inspections done within 3 years.

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|----------|---|----|----|
| <b>2</b> | 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?<br>Yes = 10 No = 0 Needs Improvement = 1-9 | 10 | 10 |
|          | <ul style="list-style-type: none"><li>a. Standard (General Code Compliance)</li><li>b. Public Awareness Effectiveness Reviews</li><li>c. Drug and Alcohol</li><li>d. Control Room Management</li><li>e. Construction</li><li>f. OQ (see Question 3 for additional requirements)</li><li>g. IMP (see Question 4 for additional requirements)</li></ul>   |    |    |

**Evaluator Notes:**

Sonoco was the only liquid inspection done in 2021. The inspection form and subsequent documentation was reviewed. There were no compliance issues. The inspection was complete and found to be in order. The exit interview was done within 30 days.

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|----------|--|---|---|
| <b>3</b> | 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<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

**Evaluator Notes:**

OQ programmatic inspections have been performed within required timeframes. An OQ field verification was performed on the Sonoco inspection in 2021.

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| <b>4</b> | 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<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|          | <ul style="list-style-type: none"><li>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?</li></ul>   |   |   |

**Evaluator Notes:**

Imp inspections were performed according to required inspection intervals, John also tracks annual IMP review of the largest operators. These reviews were completed annually.

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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 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. Review of the operator response to incidents is performed during the incident investigation.
- b. The directional boring procedure question is an addendum question on the state specific checklist.

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

Evaluator Notes:

The state typically sends advisory bulletin notifications to operators. No liquid advisory bulletins were issued 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 was one liquid inspection performed in 2021. There were no violations identified during this inspection.
- a. inspection /compliance letters are mailed to the appropriate company official.
  - b-e There were no compliance actions associated with 2021 inspections.
  - f. The Commission had penalized an operator for not inspecting the inside of a opened pipe for internal corrosion in April 2022.
  - g. The program manager reviews, approves and monitors compliance actions.
  - h. The case in f went through a commission hearing.
  - i. Exit interview are conducted within 30 days.
  - j. Inspection/compliance letters are sent within 90 days.

- 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:**

There were four liquid incidents in PDM. Sonoco Osage Co 110 bbl internal corrosion release on 12/5/2021. Holly 1 bbl O-ring failure on pig launcher in Tulsa on 2/22/21. 50 bbl internal corrosion leak on Texoma in Carter Co on 2/21/21. Keyera Energy occurred on 12/25/2021 and was a .1 bbl failure of a non threaded connection (no report required). The on-call engineer notifies the regional engineer assigned a particular area if there is a need to go on-site. All Federally reportable incidents are investigated. There were four federally reportable incidents in 2020. All incidents investigated. The Commission used PHMSA's form 11 to document federally reportable incidents. The Commission evaluates the incident for cause and compliance with 49 CFR 195. The review included the investigation report, compliance letter, operator response and closure documentation. The incidents were small incidents No violations were noted. Two investigations are still ongoing . The incidents occurred in December 2021.

- a. Oklahoma assigns an inspector to serve 24 hour on-call duty to receive pipeline incident notifications.
- b. Incidents go to on call engineer. Kelly gets notified when federal threshold met. Kelly will deploy and engineer when federal threshold is met.
- c. All four incidents were investigated
- d. The OCC utilizes PHMSA Form 11 to document its investigations.
- e. The OCC utilizes PHMSA Form 11 to document its investigations.
- f. The OCC utilizes PHMSA Form 11 to document its investigations.
- g. There were no compliance issues associated with the 2021 incidents.
- h. Federal assistance was not requested for any incidents.
- i. Lessons learned are shared during the NAPS regional meeting. The 2021 SW Region meeting was in San Antonio, TX.

**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:**

10/2/2021 letter was sent to Chair Dana Murphy. The letter did not require a response as there were no issues.

**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 2018. A seminar was scheduled to be conducted in 2021. This was cancelled due to lack of operators willing to travel due to COVID? Liquid and gas seminar done at the same time. The next seminar is scheduled for the first week of November in 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:**

The NPMS update issue is addressed in the transmission checklist. John Harper also tracks this activity on a spreadsheet. Spreadsheet was filled out in 2021. E-mails are sent to operators who did not respond. Tracking and status of submissions is maintained by John Harper on a tracking sheet.

**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. They also communicate through mailings and e-mail.

**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 Condition reports reported in 2021. This is consistent with information in the Pipeline Data Mart.

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

Evaluator Notes:

The Commission responds to NAPSRS surveys. Typically Dennis seeks input from field personnel prior to filling out the survey monkey. John Harper periodically checks IMP notifications. The Commission hasn't had any IMP notifications. All 2021 activities in WMS were closed. All 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 or special permits were issued.

**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. Electronic information and record documentation were readily available.

**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 liquid SICT days were 258. There were 333 days field days in 2021.

**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 Inspection days have gone up since 2018. There was a 10 day jump from last year. Excavation damages per 1000 ticket is trending downward to about 2.2 hits per 1000 locates. Excavation drop may be due to enhanced inspection and damage program management activities. Enforcement and incident investigation certification scores were steady at 100 percent. Core training, additional training and percent 5 year retention have all trended up since 2010.

**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 in discussion and meetings with operators. A letter supporting SMS went out in 11/20/20.

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**20** General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

No issues noted.

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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 Info Only Info Only comments box below)  
Info Only = No Points
- a. What type of inspection(s) did the state inspector conduct during the field portion of the state evaluation? (i.e. Standard, Construction, IMP, etc)
  - b. When was the unit inspected last?
  - c. Was pipeline operator or representative present during inspection?
  - d. Effort should be made to observe newest state inspector with least experience

Evaluator Notes:

The operator was Superior Pipeline Company. Vince Eitzen conducted the inspection on 4/7/2022. We witnessed the field work done in 4/7/2022

- a. This was a standard inspection. The inspection consisted field work of the Cushing and Gutries systems. Records review was conducted earlier in the week.
- b. The system received its last standard inspection 3 years ago.
- c. Operator representatives were at the inspection.
- d. Vince is one of two liquid inspectors, he has 18 years of experience.

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- 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:

Staff is switching to use the IA equivalent form. This IA equivalent form was used.

- 
- 3 Did the inspector adequately review the following during the inspection 10 10  
Yes = 10 No = 0 Needs Improvement = 1-9
- a. Procedures (were the inspector's questions of the operator adequate to determine compliance?)
  - b. Records (did the inspector adequately review trends and ask in-depth questions?)
  - c. Field Activities/Facilities (did inspector ensure that procedures were being followed, including ensuring that properly calibrated equipment was used and OQ's were acceptable?)
  - d. Other (please comment)
  - e. Was the inspection of adequate length to properly perform the inspection?

Evaluator Notes:

Vince was performing field work during the evaluation. He checked pipe to soil readings, rectifier testing, looked for signs, line markers, fire extinguishers, equipment calibration, equipment identification and atmospheric corrosion. He OQ'd pipe to soil readings and rectifier testing. He referred to procedures and records during the evaluation.

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- 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:

Vince was knowledgeable of pipeline safety program and regulation. He asked good questions and follow up questions. He went over abnormal operating conditions when he OQ'd the CP tech. He reviewed the plant layout. He checked test equipment calibrations. He check pipe to soil and rectifier readings.

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- 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:

Vince did not complete the inspection at the time of the visit but mentioned he would do an exit interview.

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6 Was inspection performed in a safe, positive, and constructive manner ?

Info Only Info Only

Info Only = No Points

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

Evaluator Notes:

- a. Vince wore proper PPE. He was knowledgeable of the system.
- b. Vince checked pipe to soil readings, rectifier testing, atmospheric corrosion, checked equipment identification tags, fire extinguishers, calibration of testing equipment, signs, markers right of way, OQ and abnormal operations.
- c. Vince controlled the inspection. He dictated where the inspection would go.
- d. N/A

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7 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

No issues found

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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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- |          |  |   |   |
|----------|--|---|---|
| <b>1</b> | Has the state reviewed Operator Annual reports, along with Incident/Accident reports, for accuracy and analyzed data for trends and operator issues.<br>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 are also submitted. Amanda enters annual report information on a spreadsheet. This is reviewed by the associated inspector.

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|----------|--|---|---|
| <b>2</b> | 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)<br>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)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

**Evaluator Notes:**

Operators are required to submit a semi annual reports which include damage prevention information. This is required in Oklahoma regulation. This is a new process and is evolving. OCC is hoping to hire 4 people to work on this. Their main purpose will be to investigate line hits. Cause information is taken from DIRT reports. OCC Looking to promote somebody from within for the damage prevention manager position. OCC investigated approximately 60 third party hits this past year. This generated violation letters which identified poor operator practices intended to prevent reoccurrence. Semi annual reports identified high damage prevention incident operators. 62 letters went to operators, 31 letters went to excavators. A majority of investigations generated a letter.

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| <b>3</b> | Has the state reviewed the operator's annual report pertaining to Part D - Excavation Damage?<br>Info Only = No Points<br>a. Is the information complete and accurate with root cause numbers?<br>b. Has the state evaluated the causes for the damages listed under "One-Call Notification Practices Not Sufficient" (Part D.1.a.)?<br>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?<br>d. Is the operator or its locating contractor(s) qualified and following written procedures for locating and marking facilities?<br>e. Is the operator appropriately requalifying locators to address performance deficiencies?<br>f. What is the number of damages resulting from mismarks?<br>g. What is the number of damages resulting from not locating within time requirements (no-shows)?<br>h. Is the operator appropriately addressing discovered mapping errors resulting in excavation damages?<br>i. Are mapping corrections timely and according to written procedures?<br>j. Has the state evaluated the causes for the damages listed under "Excavation Practices Not Sufficient" (Part D.1.c.)? | Info Only | Info Only |
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**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 from the annual report generated spreadsheet.  
b. Other category is 8 of 1516 line hits for largest state operator.  
c. Other category is 8 of 1516 line hits for largest state operator.  
d-j. State performs damage prevention investigations and addresses violations found during the investigation. Most investigations generated a violations.

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| <b>4</b> | 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?<br>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 calculates hits per 1000 from annual report data. Data is also supplied by Okie 811.

- a. Operators and excavators are the largest stakeholder group responsible for reporting. Excavators have more reports than operators.
- b. Operators participate with one call expo, home and garden show, Activities have decreased because of covid. John has done presentations. Call Okie also does presentations. This group is composed of pipeline operators.
- c. State did approximately 93 damage prevention investigations resulting in 40 violation letters. 22 operator violations and 18 excavator violations.
- d. Operators are subject to public awareness programs which is evaluated by state.

**5** General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

No issues found.

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:

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:

No issues found.

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

