

PHMSA UNDERGROUND NATURAL GAS STORAGE (UNGS)
Alabama OGB PROGRAM EVALUATION – CY2022
CONDUCTED 7/17-20/2023

| | |
|---|-------------------------|
| A – PROGRESS REPORT AND PROGRAM DOCUMENTATION REVIEW | 9 of 9 |
| B – PROGRAM INSPECTION PROCEDURES | 9 of 9 (14) |
| C – PROGRAM PERFORMANCE | 21 of 23 (34) |
| D – COMPLIANCE ACTIVITIES | 4 of 4 (21) |
| E – INCIDENT INVESTIGATIONS | 1 of 2 (13) |
| F – DAMAGE PREVENTION | 2 of 4 |
| G – FIELD INSPECTIONS | 12 of 12 |
| H - 60106 AGREEMENT STATE (if applicable) | 0.5 of 1 (6) |
| TOTAL PROGRAM EVALUATION POINTS | 58.5 of 64 (113) |

PHMSA UNGS STATE PROGRAM EVALUATION – CY2022

| A – PROGRESS REPORT AND PROGRAM DOCUMENTATION REVIEW THIS SECTION ANALYZES ACCURACY AND COMPLETENESS OF ANNUAL PROGRESS REPORT | | SCORE |
|---|--|-------|
| 1 | Accuracy of Jurisdictional Authority and Operator/Inspection Units Data – Progress Report Attachment 1 (Yes= 1 point, No= 0 Points, NI=.5 point) Comments: Yes. Attachment 1 is in agreement with State Program records and Attachment 3. | 1 |
| 2 | Review of Inspection Days for accuracy – Progress Report Attachment 2 (Yes= 1 point, No= 0 Points, NI=.5 point) Comments: Yes. Information matches Agency records. | 1 |
| 3 | Accuracy verification of Operators and Operators Inspection Units in State – Progress Report Attachment 3 (Yes= 1 point, No= 0 Points, NI=.5 point) Comments: Yes. Operator count matched Agency records. | 1 |
| 4 | Accuracy verification of Compliance Activities – Progress Report Attachment 5 (Yes= 1 point, No= 0 Points, NI=.5 point) Comments: Yes. The last UNGS Inspection was in 2019 by PHMSA with Butch participating. Deadline for the next inspection is 2024; Wellhead inspections were performed in January and June of 2022. No violations were found. | 1 |
| 5 | Were UNGS program files well-organized and accessible? - Progress Report Attachment 6 (Yes= 2 points, No= 0 Points, NI=1 point) Comments: Yes. Some records are still paper but most are electronic and were easily accessible. | 2 |
| 6 | Was employee listing and completed training accurate and complete? – Progress Report Attachment 7 (Yes= 1 point, No= 0 Points, NI=.5 point) Comments: All time was calculated from a report from accounting showing individual personnel time that was charged to UNGS and referenced to the various inspections of UNGS during 2022. | 1 |
| 7 | Verification of Part 192 and 199 Rules and Amendments – Progress Report Attachment 8 (Yes= 1 point, No= 0 Points) Comments: Yes. The information is correct. | 1 |
| 8 | List of Planned Performance - Did State describe accomplishments on Progress Report in detail – Progress Report Attachment 10 (Yes= 1 point, No= 0 Points, NI=.5 point) Comments: Yes. The report reflects a UNGS Program in its second year of operation. | 1 |
| 9 | General Comments: Charles E. (Ward) Pearson, Chairman, State Oil and Gas Board of Alabama, 420 Hackberry Lane, Tuscaloosa, AL 35401. UNGS PROGRESS REPORT REVIEW score is 40 of 50, a 6 pt deduction due to being a 60106 partner and a 4 pt deduction due the highest percentage of inspectors being in categories I, II. III. No incidents reported in 2020-2022. 2022 was the third year for our UNGS Partnership. Project activity in 2023 activity to match 2022. Taking needed courses through PHMSA TQ was discussed. Part A scored 9 of 9 points. | 9 |

| B – PROGRAM INSPECTION PROCEDURES Does State Inspection Plan include procedures that address the following elements? (See Guidelines Section 5.1) | | |
|--|---|---|
| 1 | Does State have written inspection procedures?(Yes= 2 points, No= 0 Points, NI=1 point) Comments: Yes. AL OGB has created its UNGS written Inspection Procedures, See AL OGB UNGS Procedures Manual. | 2 |
| 2 | <p>Standard Inspections</p> <p>Do Standard Inspection procedures give guidance to State inspectors that insure consistency for inspections conducted by the State? The following elements should be addressed at a minimum. (Review of Procedures, Records, or Field Items to complete a PHMSA UNGS IA Question Set (RESERVOIR or CAVERN) – 2019.12.31)</p> <ul style="list-style-type: none"> • Pre-Inspection Activities • Inspection Activities • Post Inspection Activities <p>(Yes= 2 points, No= 0 Points, NI=1 point) Comments: Yes. See pgs 7-9 of the Procedures Manual.</p> | 2 |
| 3 | <p>Integrity Management Inspections</p> <ul style="list-style-type: none"> • Do Integrity Management Inspection procedures give guidance to State inspectors that insure consistency for inspections conducted by the State? The following elements should be addressed at a minimum. (Integrity Testing and Maintenance: Observing Integrity Testing (Tubing, Casing, Cement), reservoir integrity monitoring, & FLIR Camera inspections.) • Pre-Inspection Activities • Inspection Activities <p>Post Inspection Activities(Yes= 2 points, No= 0 Points, NI=1 point) Comments: Yes. See pgs 10-11 of the Procedures Manual.</p> | 2 |
| 4 | <p>Design, Testing, and Construction Inspections</p> <p>Do Design, Testing, and Construction Inspection procedures give guidance to State inspectors that insure consistency for Inspections conducted by the State? The following elements should be addressed at a minimum. (Review of procedures, records, and field activities to complete PHMSA UNGS IA Question Set (RESERVOIR or CAVERN CONSTRUCTION) – 2019.12.31. Inspection activities for well design, drilling and completion activities, well workover, reservoir maintenance/repair activities, and abandonment (Plugging and cementing), temporary abandonment, and restoration.)</p> <ul style="list-style-type: none"> • Pre-Inspection Activities • Inspection Activities • Post Inspection Activities <p>(Yes= 1 point, No= 0 Points, NI=.5 point) Comments: Yes. See pg 12 of the Procedures Manual.</p> | 1 |

| | | |
|---|--|----|
| 5 | <p>Wellhead Inspections</p> <p>Do Wellhead Inspection procedures give guidance to State inspectors that insure consistency for Inspections conducted by the State? The following elements should be addressed at a minimum.</p> <ul style="list-style-type: none"> • Pre-Inspection Activities • Inspection Activities • Post Inspection Activities <p>(Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p>Comments: Yes. See pgs 11-12 of the Procedures Manual.</p> | 1 |
| 6 | <p>Drug and Alcohol Inspections</p> <p>Do Drug and Alcohol Inspection procedures give guidance to State inspectors that insure consistency for Inspections conducted by the State? The following elements should be addressed at a minimum. (Using AI to complete the federal Comprehensive Drug and Alcohol program (Form 3.1.11). Includes time conducting joint inspections with other agencies for this type of inspection.)</p> <ul style="list-style-type: none"> • Pre-Inspection Activities • Inspection Activities • Post Inspection Activities <p>(Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p>Comments: Yes. See pg 12 of the Procedures Manual.</p> | 1 |
| 7 | <p>Does inspection plan address inspection priorities of each inspection unit, based on the following elements?</p> <ul style="list-style-type: none"> • Length of time since last inspection (Within five-year interval per inspection unit) • Operating history of operator/unit and/or location (includes leakage, incident, Integrity Testing, and compliance activities) • Type of activity being undertaken by operators in inspection units (i.e. construction) • Locations of operator's inspection units being inspected - (Geographic area, Population Density, etc.) • Process to identify high-risk inspection units considering integrity threats <p>Are inspection units broken down appropriately?(Yes= 5 points, No= 0 Points, NI=1-4 points)</p> <p>Comments: NA. does not apply, there is only one operator and one Unit.</p> | NA |
| 8 | <p>General Comments: Part B scored 9 of 9 points.</p> | 9 |

| C – PROGRAM PERFORMANCE | | |
|-------------------------|---|----|
| 1 | <p>Was ratio of Total Inspection Person-Days to Total Person-Days acceptable? (Chapter 4.2)</p> <p>A = Total Inspection Person Days (Attachment 2) B = Total Inspection Person Days Charged to the program (220 x Number of Inspection person years from Attachment 7) Ratio = A/B If Ratio >= .38 then score = 5 points. If Ratio < .38 then score = 0 points. (Yes= 5 points, No= 0 Points) Comments: 15.5 inspection days, 220*0.0714=15.71 Inspector person days, 15.5/15.71=.99 >.38, okay.</p> | 5 |
| 2 | <p>Has each Inspector and Program Manager fulfilled the TQ Training Requirements? (See Guidelines Appendix C for requirements and Chapter 4.3.1) (Yes= 5 points, No= 0 Points, NI=1-4)</p> <p>Comments: Yes. In third year of the Partnership. TQ classes are being scheduled. Discussed the three-year requirement for inspectors to be trained.</p> | 5 |
| 3 | <p>Does State use the PHMSA Inspection Assistant (IA) program to document inspections? (Yes= 2 points, No= 0 Points, NI=1 point)</p> <p>Comments: NA. No UNGS inspections were performed in 2020-22. IA was discussed. Also discussed that the Section 114 UNGS inspection, done in March 2022, needed to be loaded into IA.</p> | NA |
| 4 | <p>Did records and discussions with Program Manager indicate adequate knowledge of PHMSA program and regulations? Chapter 4.1,8.1 (Yes= 2 points, No= 0 Points, NI=1 point)</p> <p>Comments: NI 1 of 2 points. AL OGB personnel need to become IA users. Training is continuing.</p> | 1 |
| 5 | <p>Did State respond to PHMSA's Evaluation Letter within 60 days and correct or address any noted deficiencies? Chapter 8.1 (Yes= 2 points, No= 0 Points, NI=1 point)</p> <p>Comments: NI 1 of 2 points. Almost 11/29 PM to 2/1; 64 days; ouch.</p> | 1 |
| 6 | <p>Did State inspect all types of operators and inspection units in accordance with time intervals established in their written procedures? Chapter 5.1 (Yes= 5 points, No= 0 Points, NI=1-4 points)</p> <p>Comments: Yes. Procedures specify a 5 year maximum interval for most inspections with a 1 year frequency for wellhead inspections. All are within the time intervals.</p> | 5 |
| 7 | <p>Did State Inspection form(s) cover all applicable code requirements addressed on Federal Inspection form(s)? Chapter 5.1 (Yes= 2 points, No= 0 Points, NI=1 point)</p> <p>Comments: NA. A full UNGS Inspection has yet to be done. Discussed that AL OGB will use the Federal forms in IA.</p> | NA |
| 8 | <p>Did State complete all applicable portions of inspection forms? (Yes= 2 points, No= 0 Points, NI=1 point)</p> <p>Comments: NA. A full UNGS Inspection has yet to be done. Discussed that IA will be used and all applicable portions will be completed.</p> | NA |
| 9 | <p>Has the State reviewed Operator Annual reports, along with Incident reports, for accuracy and analyzed data for trends and operator issues? (Yes= 2 points, No= 0 Points, NI=1 point)</p> <p>Comments: Yes. Bay Gas UNGS rpts for 2018 - 2022 have all been received and reviewed for accuracy. Documentation of the review is by spreadsheet and it is saved in the Annual Report file.</p> | 2 |

| | | |
|----|---|----|
| 10 | <p>Is the State verifying operators are conducting drug and alcohol tests required by regulations? This should include verifying positive tests are responded to in accordance with program. 49 CFR 199</p> <p>(Yes= 2 points, No= 0 Points, NI= 1 point)</p> <p>Comments: NA. Third year of program. The need for D&A inspections was discussed and coordination with AL PSC was discussed.</p> | NA |
| 11 | <p>Does the State have a mechanism for communicating with stakeholders regarding the inspection and enforcement program? (This should include making enforcement cases available to public).</p> <p>(Yes= 1 points, No= 0 Points, NI=.5 point)</p> <p>Comments: Yes. The website allows access to many records, and paper records are accessible to the public. Closed enforcement cases are available upon request.</p> | 1 |
| 12 | <p>Did State execute appropriate follow-up actions to Safety Related Condition Reports (SRCR)? Chapter 6.3</p> <p>(Yes= 1 points, No= 0 Points, NI=.5 point)</p> <p>Comments: NA. there were no SRCs in 2022, or for the life of the partnership.</p> | NA |
| 13 | <p>Did the State participate in/respond to surveys or information requests from PHMSA?</p> <p>(Yes= 1 points, No= 0 Points, NI=.5 point)</p> <p>Comments: Yes. Information requests would be responded to but no survey requests were made in 2022.</p> | 1 |
| 14 | <p>Did the State forward any potential waivers/special permits to PHMSA for review prior to issuing them to operators?</p> <p>(Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p>Comments: NA. No waivers/special permits were requested concerning UNGS.</p> | NA |
| 15 | <p>If the State has issued any waivers/special permits for any operator, has the State verified conditions of those waivers/special permits are being met? This should include having the operator amend procedures where appropriate.</p> <p>(Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p>Comments: NA. No waivers/special permits were requested concerning UNGS.</p> | NA |
| 16 | <p>General Comments: Part C scored 21 of 23 points. Seven questions were NA: 3,7,8,10,12,14, & 15. Two questions were NI: 4 & 5.</p> | 23 |

| D – COMPLIANCE ACTIVITIES | | |
|---------------------------|---|----|
| 1 | <p>Does the State have written procedures to identify steps to be taken from the discovery to resolution of a probable violation? Chapter 5.1</p> <ul style="list-style-type: none"> • Procedures to notify an operator (company officer) when a noncompliance is identified (60105 States) • Procedures to routinely review progress of compliance actions to prevent delays or breakdowns • Procedures regarding closing outstanding probable violations <p>(Yes= 4 points, No= 0 Points, NI=1-3 points) Comments: Yes. See Procedures on pg 13.</p> | 4 |
| 2 | <p>Did the State follow compliance procedures (from discovery to resolution) and adequately document all probable violations, including what resolution or further course of action is needed to gain compliance? Chapter 5.1</p> <ul style="list-style-type: none"> • Were compliance actions sent to company officer or manager/board member if municipal/government system (60105 States)? • Document probable violations • Resolve probable violations • Routinely review progress of probable violations <p>(Yes= 4 points, No= 0 Points, NI=1-3 points) Comments: NA. only routine site inspections were performed in 2022. No violations found. Established practices were followed.</p> | NA |
| 3 | <p>Did State within 30 days of the end of an inspection conduct a post-inspection briefing with the owner or operator of the UNGS facility inspected outlining any concerns identified during the inspection?</p> <p>(Yes= 2 points, No= 0 Points, NI=1 point) Comments: NA. It's in the Procedures pg 10.</p> | NA |
| 4 | <p>Did State within 90 days, to the extent practicable, provide the owner or operator with written preliminary findings of the inspection?</p> <p>(Yes= 2 points, No= 0 Points, NI=1 point) Comments: NA. It's in the Procedures pg 10.</p> | NA |
| 5 | <p>Did the State issue compliance actions for all probable violations discovered (60105 States)?</p> <p>(Yes= 2 points, No= 0 Points, NI=1 point) Comments: NA. AL OGB is a 60106 Agreement Partner.</p> | NA |
| 6 | <p>Did compliance actions give reasonable due process to all parties? Including "show cause" hearing if necessary (60105 States).</p> <p>(Yes= 2 points, No= 0 Points) Comments: NA. AL OGB is a 60106 Agreement Partner.</p> | NA |

| | | |
|----|--|----|
| 7 | <p>Is the Program Manager familiar with State process for imposing civil penalties (60105 States)? (describe any actions taken) (Yes= 2 points, No= 0 Points, NI=1 point)</p> <p>Comments: NA. 60106 program. The AL OGB does have a process and the Program Manager is familiar with it.</p> | NA |
| 8 | <p>Were civil penalties considered for repeat violations, violations which can't be corrected by other means, or violations resulting in incidents (60105 States)? (Yes= 2 points, No= 0Points, NI=1 point)</p> <p>Comments: NA. 60106 program. The AL OGB does have a process and the Program Manager is familiar with it.</p> | NA |
| 9 | <p>Can the State demonstrate it is using their enforcement fining authority for safety violations (60105 States)? (Yes= 1 point, No= 0 Points, NI= .5 point)</p> <p>Comments: NA. 60106 program. The AL OGB does have a process and the Program Manager is familiar with it.</p> | NA |
| 10 | General Comments: Part D scored 4 of 4 points. 8 of 9 questions were NA, 2,3,4,5,6,7,8 & 9. | 4 |

| E – INCIDENT INVESTIGATIONS | | |
|-----------------------------|---|----|
| 1 | <p>Does the State have written procedures to address State actions in the event of an incident? (Yes= 2 points, No= 0 Points, NI=1 point)</p> <p>Comments: NI 1 of 2 points. Item E, Incident investigation/Followup, pg 10, needs improvement.</p> | 1 |
| 2 | <p>Does State have adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports? (Yes= 2 points, No= 0 Points, NI=1 point)</p> <p>Comments: NA. No UNGS incidents in 2020-22. AL OGB practices need to be written into the UNGS Procedures.</p> | NA |
| 3 | <p>Did the State keep adequate records of Incident notifications received? (Yes= 2 points, No= 0 Points, NI=1 point)</p> <p>Comments: NA. No UNGS incidents in 2020-22. AL OGB practices need to be written into the UNGS Procedures.</p> | NA |
| 4 | <p>If onsite investigation was not made, did State obtain sufficient information from the operator and/or by other means to determine the facts to support the decision to not go on-site? Chapter 6 (Yes= 1 point, No= 0 Points, NI= .5 point)</p> <p>Comments: NA, No UNGS incidents in 2020-22. AL OGB practices need to be written into the UNGS Procedures.</p> | NA |
| 5 | <p>Were all incidents investigated, thoroughly documented, and with conclusions and recommendations?</p> <ul style="list-style-type: none"> • Observations and document review • Contributing Factors • Recommendations to prevent recurrences where appropriate <p>(Yes= 3 points, No= 0 Points, NI=1-2 points)</p> <p>Comments: NA, No UNGS incidents in 2020-22. AL OGB practices need to be written into the UNGS Procedures.</p> | NA |
| 6 | <p>Did the State initiate compliance action for violations found during any incident investigation? (60106 States forward violations to PHMSA) (Yes= 1 point, No= 0 Points)</p> <p>Comments: NA, No UNGS incidents in 2020-22. AL OGB practices need to be written into the UNGS Procedures.</p> | NA |
| 7 | <p>Did the State assist the Region Office or Accident Investigation Division (AID) by taking appropriate follow-up actions related to the operator incident reports to ensure accuracy and final report has been received by PHMSA? (validate report data from operators concerning incidents and investigate discrepancies) Chapter 6 (Yes= 1 point, No= 0 Points, NI= .5 point)</p> <p>Comments: NA. No PHMSA requests in 2020-22. Accident Investigation agreements need to be written/referenced into the UNGS Procedures.</p> | NA |
| 8 | <p>Does State share lessons learned from incidents with PHMSA? (Yes= 1 point, No= 0 Points)</p> <p>Comments: NA. No UNGS incidents in 2020-22. lessons learned from incidents need to be written into the UNGS Procedures.</p> | NA |

| | | |
|---|--|---|
| 9 | General Comments: Part E scored 1 of 2 points. 7 Questions, #2-8, were NA. | 1 |
|---|--|---|

| F – DAMAGE PREVENTION | | |
|-----------------------|---|---|
| 1 | <p>Did the State inspector verify UNGS operators are following their written procedures pertaining to notification of excavation, marking, positive response and the availability and use of the one call system? (API 1171 Section 11.10 Public Awareness and Damage Prevention) (Yes= 2 points, No= 0 Points, NI=1 Point)</p> <p>Comments: No, 0 of 2 point. Damage prevention was not addressed in 2020-22. Discussed creating a MOU with AL PSC for Damage prevention inspections. This will be included in the UNGS Procedures.</p> | 0 |
| 2 | <p>Did the State encourage and promote practices for reducing damages to all underground facilities to its regulated companies? (Common Ground Alliance Best Practices, support excavation damage prevention legislation, etc.) (Yes= 2 points, No= 0 Points, NI=1 Point)</p> <p>Comments: Yes. The State of AL is encouraging and promoting practices for reducing damages.</p> | 2 |
| 3 | <p>General Comments: Part F scored 2 of 4 points.</p> | 4 |

| G – FIELD INSPECTIONS | | |
|-----------------------|--|---|
| 1 | Operator, Inspector, Location, Date and PHMSA Representative Comments: Bay Gas Storage Company, LLC.\, OPID 30026, Jeremy Williams, Field Agent, 251-525-3327; Bay Gas Storage Facility, McIntosh, AL; 7/18/23; Patrick Gaume, UNGS State Liaison, PHMSA | |
| 2 | Was the operator or operator's representative notified and/or given the opportunity to be present during inspection? (Yes= 1 point, No= 0 Points) Comments: Yes. 7 Bay Gas Storage Personnel participated in the inspection. | 1 |
| 3 | Did the inspector use an appropriate inspection form/checklist and was the form/checklist used as a guide for the inspection? (Yes= 2 points, No= 0 Points, NI=1 Point) Comments: Yes. It was a special Inspection that used 29 questions from the UNGS Caverns- Gas Storage Operations module in IA. | 2 |
| 4 | Did the inspector thoroughly document results of the inspection? (Yes= 2 points, No= 0 Points, NI=1 Point) Comments: Yes. Every question was reviewed. Most had notations. | 2 |
| 5 | Did the inspector check to see if the operator had necessary equipment during inspection to conduct tasks viewed? (Yes= 1 point, No= 0 Points) Comments: Yes. It was at the operator's facility and all resources were available. All inspector requests were responded to by the operator. | 1 |
| 6 | Did the inspector adequately review the following during the field portion of the State Program Evaluation? <ul style="list-style-type: none"> • Procedures • Records • Field Activities/Facilities • Other (please comment) (Yes= 2 points, No= 0 Points, NI=1 Point) Comments: Yes. The question set included questions relating to Procedures, Records , and Field Observations. | 2 |
| 7 | Did the inspector have adequate knowledge of the UNGS safety program and regulations? (Evaluator will document reasons if unacceptable) (Yes= 2 points, No= 0 Points, NI=1 Point) Comments: Yes. Jeremy demonstrated a professional demeanor and knowledge while conducting the inspection. | 2 |
| 8 | Did the inspector conduct an exit interview? (If inspection is not totally complete the interview should be based on areas covered during time of field evaluation) (Yes= 1 point, No= 0 Points) Comments: Yes. It was a good cooperative inspection and no violations were found. | 1 |

[illegible]

| H - 60106 AGREEMENT STATE (if applicable) | | |
|---|---|----|
| 1 | <p>Did the State use the current federal inspection form(s)? (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p>Comments: NI 0.5 of 1 point. AL OGB will use IA. IA WAS loaded onto AL OGB computers IN 2021. Discussed getting UNGS Inspections loaded into IA, specifically the Section 114 inspection, wellhead inspections, and all others as applicable.</p> | .5 |
| 2 | <p>Are results documented demonstrating inspection units were reviewed in accordance with State inspection plan? (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p>Comments: NA. No Standard Inspections have been performed. Wellhead inspections on the AL OGB wellhead inspection form.</p> | NA |
| 3 | <p>Were all probable violations identified by State referred to PHMSA for compliance action? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.) (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p>Comments: NA. No Standard Inspections have been performed. No probable violations have been found.</p> | NA |
| 4 | <p>Did the State immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p>Comments: NA. No Standard Inspections have been performed. No SRC or safety hazards discovered.</p> | NA |
| 5 | <p>Did the State give written notice to PHMSA within 60 days of all probable violations found? (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p>Comments: NA. No Standard Inspections have been performed.</p> | NA |
| 6 | <p>Did the State initially submit adequate documentation to support compliance action by PHMSA on probable violations? (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p>Comments: NA. No Standard Inspections have been performed.</p> | NA |
| 7 | <p>General Comments: Part H scored 0.5 of 1 point. 5 of 6 questions were NA.</p> | NA |