

PHMSA UNDERGROUND NATURAL GAS STORAGE (UNGS)
CalGEM State PROGRAM EVALUATION – CY2022
CONDUCTED 4/4-6/2023

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TOTAL PROGRAM EVALUATION POINTS	100.5 of 101 (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 consistent with internal records and with attachment 3 & 8.	1
2	Review of Inspection Days for accuracy – Progress Report Attachment 2 (Yes= 1 point, No= 0 Points, NI=.5 point) Comments: Yes. Attachment 2 is consistent with internal records and is shown in days. Wellhead time was recorded by hours and converted to days at 8 hrs/day.	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. Attachment 3 is consistent with internal records.	1
4	Accuracy verification of Compliance Activities – Progress Report Attachment 5 (Yes= 1 point, No= 0 Points, NI=.5 point) Comments: NI, .5 of 1 point. Carry over should be 55. the 27 actions should possibly be 28. Totals of compliance actions completed plus compliance actions pending do not agree with the compliance actions carried in plus compliance actions found.	.5
5	Were UNGS program files well-organized and accessible? - Progress Report Attachment 6 (Yes= 2 points, No= 0 Points, NI=1 point) Comments: Yes. Attachment 6 is consistent with internal records. All necessary records are electronic.	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: Yes. Internal records show that 63 all-time & 49 current inspectors had the PL1325 UNGS course and 7 inspectors had the PL3DA D&A WBT course.	1
7	Verification of Part 192 and 199 Rules and Amendments – Progress Report Attachment 8 (Yes= 1 point, No= 0 Points) Comments: Yes. Most items not yet adopted. Is a 60106 program.	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. Attachment 10 items were well described.	1
9	General Comments: David Shabazian, Department of Conservation, Director's Office, 715 P Street, MS 1900, Sacramento, CA 95814. Emily Reader, UNGS Program Manager, and Jeanette Hand, UNGS Program Deputy Manager CalGEM, Patrick Gaume, Evaluator. UNGS PROGRESS REPORT REVIEW score is 44 of 50; 6-point reduction due to being a 60106 Program: One incident was reported in UNGS for 2022: Gill Ranch Storage LLC filed an Incident Report with the National Response Center (NRC) on	8.5

	<p>Monday, September 5th per the September 3rd lodging of a workover tool string within the primary isolation valve of a gas storage well during a wireline operation. An unknown quantity of gas was released during the incident. See Incident Report 20220106-37543.</p> <p>CalGEM promptly followed up per request of and in coordination with PHMSA's Curtis Huff. Records of the incident are in PHMSA Work Management System (Activity ID 22-253986) and in CalGEM's UNGS Safety Grant program records. total operator cost was \$520K.</p> <p>Part A scored 8.5 of 9 points. A4 was NI for .5 of 1 point.</p>	
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B – PROGRAM INSPECTION PROCEDURES Does State Inspection Plan include procedures that address the following elements? (See Guidelines Section 5.1)		
1	<p>Does State have written inspection procedures?(Yes= 2 points, No= 0 Points, NI=1 point) Comments: Yes. Title is 'CalGem UNGS Safety Grant Program Procedures Manual' (SM).</p>	2
2	<p>Standard Inspections 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 Section 3. Most items are included in 'General Inspection Plan'.</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 Section 3. Most items are included in 'General Inspection Plan'. Also see:</p> <ul style="list-style-type: none"> • Field Engineer guidance and Training Program • Associate Guidance and Training Classes • Education and Resources • WellSTAR guidance and Training Materials 	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)</p> <p>Comments: Yes, See Section 3. Most items are included in ‘General Inspection Plan’. Note Section 3.2.</p>	1
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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 Section 3. Most items are included in 'General Inspection Plan'. Note Section 3.2.5.</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 Section 3. Most items are included in 'General Inspection Plan'. Note Section 3.2.10.</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: Yes, See Section 3. Note Section 3.1 & 3.1.1.</p>	5
8	<p>General Comments: Part B scored 14 of 14 points.</p>	14

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: YES. 5 of 5 points awarded. $746.6/(220*4.34)=0.782$, >0.38 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) Comments: Yes. 49 current inspectors have taken the UNGS Course and others are scheduled for the course. 7 inspectors have completed the PL3DA D&A WBT class.</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) Comments: Yes. IA is used.</p>	2
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) Comments: Yes. Emily and Jeanette demonstrate knowledge of the UNGS Program.</p>	2
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) Comments: Yes. The Evaluation letter was sent on Nov 29th and the CalGEM response was sent on Jan 25th. All deficiencies were addressed.</p>	2
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) Comments: Yes. Every operator is visited every year. CALGEM is coordinating with CPUC for the D&A inspections.</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) Comments: Yes. IA is used for all inspections. CPUC also uses IA so most of the D&A inspections are found in IA under CPUC. Revisited that the CalGEM Inspector needs to be listed as an inspector if it is to count as a joint inspection. Noted that D&A inspections done by others may become acceptable for CalGEM credit if they are properly applicable to CA UNGS facilities.</p>	2
8	<p>Did State complete all applicable portions of inspection forms? (Yes= 2 points, No= 0 Points, NI=1 point) Comments: Yes. The inspections are in IA and complete. Most inspections cover 2 UNGS modules, so a full inspection is completed every three years.</p>	2
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) Comments: Yes. Annual reports are being reviewed and records of the review can be seen in spreadsheets and in the database.</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: Yes. Started participating with CPUC for HQ inspections that included D&A inspections.</p>	2
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. CA is a full disclosure State, almost everything is available on the public website. See CalGEM's WellSTAR software system and CalGEM is in the process of migrating copies of Reports of Written Preliminary Findings onto WellSTAR.</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: Yes.</p> <p>Central Valley Gas Storage LLC filed a SRCR (WMS Activity ID 22-243441) on May 13, 2022, after logging discovering low cement quality within a critical zone of gas storage well 3L. Cal GEM responded and monitored the repair efforts. The SRC repairs were completed and tested on 7/25/22.</p>	1
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. CalGEM is very responsive to PHMSA requests.</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 have been requested. Procedures are in place.</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 have been requested. Procedures are in place.</p>	NA
16	<p>General Comments: Part C scored 32 of 32 points.</p>	32

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 Section 3.2.7, 3.2.11, 3.2.15, 3.2.16, 3.2.17. Also see new draft SOP “Preparing Written Preliminary Findings (WPF) reports for CalGEM-led PHMSA inspections” and “Inspection Lead Checklist”</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: Yes. Information was forwarded to PHMSA, Eastern Region, for several compliance actions.</p>	4
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: Yes. Exit briefings were given on the last day of every inspection. Also see “Inspection Lead Checklist”.</p>	2
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: Yes. An email is usually sent within a day of the verbal Exit briefing, and a more formal email is sent later. See Section 3.2.17. Also see “Inspection Lead Checklist”.</p>	2
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. All items of Concern and UnSat were submitted to PHMSA.</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. 60106, and the process is in place, See Section 3.2.7, 3.2.11, 3.2.15, 3.2.16, 3.2.17.</p>	NA

7	<p>Is the Program Manager familiar with State process for imposing civil penalties (60105 States)? (describe any actions taken)</p> <p>(Yes= 2 points, No= 0 Points, NI=1 point)</p> <p>Comments: NA. 60106, The Program Manager is aware of the process. Several civil penalties have been issued on the E&P side of CalGEM's jurisdiction.</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, CalGEM is a 60106 Partner. Recommendations were submitted to PHMSA.</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. CalGEM is a 60106 Partner. However, several civil penalties have been issued on the E&P side of CalGEM's jurisdiction.</p>	NA
10	<p>General Comments: Part D scored 12 of 12 points. C5-C9 were NA, is a 60106 Agreement Partner.</p>	12

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: Yes. See Section 3.2.8. Also see Field Inspection, Incident, and Enforcement Modules.</p>	2
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: Yes. See Section 3.2.8 and Section 16. In addition all inspectors have cell phones and access to investigative resources.</p>	2
3	<p>Did the State keep adequate records of Incident notifications received? (Yes= 2 points, No= 0 Points, NI=1 point)</p> <p>Comments: Yes. CalGEM receives NRC notices and has regulations requiring that Operators contact CalGEM directly, i.e. Sacramento District Office is 916-322-1110.</p>	2
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: Yes. Go/No-Go decisions are the responsibility of a District Supervisor; CalGEM did not make an onsite investigation when the National Response Center was notified of an incident on September 5, 2022 (NRC Report.) Two days earlier (Saturday p.m., September 5th) a CalGEM Field Operations (district) inspector had informed their supervisor of the incident, contacted the operator on September 4 and 5, and received verbal update from the operator late morning Monday, September 5 (see record here .)</p> <p>CalGEM's Field Operations and HQ UGS unit determined that the NRC report, CalGEM phone conversation with the operator (cited immediately above), the minor nature of the event, and the operator's same-day resolution constituted sufficient determination of the facts such that an on-site visit was unnecessary.</p> <p>The Incident Report file was reviewed and found to be complete. No violations found.</p>	1
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: Yes. The Incident Report file was reviewed and found to be complete. No violations found.</p>	3
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: Yes, 60106 partner, incident investigation was made, no violations found.</p>	1
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: Yes, PHMSA AID was notified, AID questionnaires were completed.</p>	1

8	<p>Does State share lessons learned from incidents with PHMSA? (Yes= 1 point, No= 0 Points)</p> <p>Comments: Yes. CalGEM proactively contacts PHMSA staff to discuss findings, proposed responses, and lessons learned. Catherine Washabaugh and Jeanette meet monthly to discuss a variety of topics including incident response.</p>	1
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9	General Comments: Part E scored 13 of 13 points.	13
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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: The State of California does ensure that landowners, operators, and contractors notify, mark, and respond prior to excavation.</p> <p>The California Underground Facilities Safe Excavation Board was created by the state's Dig Safe Act of 2016 and has primary state authority for California's compliance with the nine elements of the federal PIPES Act of 2006. The board is part of California's Office of Energy Infrastructure Safety.</p>	2
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. Damage Prevention is a common subject of conversation when meeting with Operators, and all parties know that Damage prevention is emphasized.</p>	2
3	<p>General Comments: Part F scored 4 of 4 points.</p>	4

G – FIELD INSPECTIONS		
1	Operator, Inspector, Location, Date and PHMSA Representative Comments: Central Valley Gas Storage LLC. Opid 32603, Dan Wynne Lead Inspector, 4/5-7/23, Patrick Gaume. Other CalGEM inspectors: Jeanette Hand, Eric Heaton, Michael Brooks, Alex Rustandjaja, Kathryn Honeycutt-Larios, Richard Boakye-Yiadom, Ben Goldstone, Alireza Qazvini, Kris Gustophson, & Tom Simura.	
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. 6 operator 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. This was a special inspection that concentrated on two modules, Reservoirs-Integrity in well design and construction, and some in Reservoirs Procedures and Training.	2
4	Did the inspector thoroughly document results of the inspection? (Yes= 2 points, No= 0 Points, NI=1 Point) Comments: Yes. All questions other than Sat were documented.	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, this was mostly Procedures and Records, all office resources were available.	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, this was mostly Procedures and Records, Everything within the scope of the Inspection was addressed.	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. Dan and most of the inspection have years of experience in UNGS.	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. The inspection went well, and no violations were found. 2 questions, #50 & 52, were progress checks on a pending violation from last year's inspection.	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: Yes. IA is used and appropriate questions are selected.</p>	1
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: Yes. Special Inspections are conducted every year with a complete Standard Inspection by the 3rd year, not to exceed 5 years. D&A inspections will be joint with CA PUC not to exceed 5 years.</p>	1
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: Yes. All Concerns and UnSat findings are referred to PHMSA. CalGEM made all referrals via Inspection Assistant and through the PIMs process.</p>	1
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, none since 2018; It would be immediately reported to PHMSA and is in CalGEM procedures. See Section 3.2.1.</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: YES. CalGEM uses IA so probable violations are available to PHMSA upon entry into the system.</p>	1
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: Yes. CalGEM refers all Concerns and UnSat to PHMSA with documentation uploaded into IA.</p>	1
7	<p>General Comments: Part H scored 5 of 5 points. H5 is NA.</p>	5