

**PHMSA UNDERGROUND NATURAL GAS STORAGE (UNGS)
IN DNR PROGRAM EVALUATION – CY2022
CONDUCTED 6/5-8/2023**

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TOTAL PROGRAM EVALUATION POINTS	90.5 of 97 (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	<p>Accuracy of Jurisdictional Authority and Operator/Inspection Units Data – Progress Report Attachment 1 (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p>Comments: NI 0.5 of 1 point. Attachment 1 Operator report was not in agreement with Attachment 3, and the Inspection Unit counts were in error. IN DNR agreed to rework and resubmit Attachment 1. Attachment 1 from CY 2021 was referenced as a cross reference.</p>	0.5
2	<p>Review of Inspection Days for accuracy – Progress Report Attachment 2 (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p>Comments: Yes. Numbers agree with agency records. Advised that it is intended that Attachment 2 be reported in days.</p>	1
3	<p>Accuracy verification of Operators and Operators Inspection Units in State – Progress Report Attachment 3 (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p>Comments: Yes. Attachment 3 agrees with Agency records. Observed that Attachment 3 will be double checked as Attachment 1 is revised; also, to verify if the operators are properly classed as Private or Public Utility.</p>	1
4	<p>Accuracy verification of Compliance Activities – Progress Report Attachment 5 (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p>Comments: Yes. All violations were for paperwork violations of State Regulations.</p>	1
5	<p>Were UNGS program files well-organized and accessible? - Progress Report Attachment 6 (Yes= 2 points, No= 0 Points, NI=1 point)</p> <p>Comments: NI 1 of 2 points. All are recorded electronically. Advised that more records should be referenced, i.e., Annual reports, violation reports, inspection records, etc. Personnel change continues to impact the ease of records access.</p>	1
6	<p>Was employee listing and completed training accurate and complete? – Progress Report Attachment 7 (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p>Comments: Yes. Personnel time is consistent with Agency records. The inspectors are classed in accordance with their experience and TQ training.</p>	1
7	<p>Verification of Part 192 and 199 Rules and Amendments – Progress Report Attachment 8 (Yes= 1 point, No= 0 Points)</p> <p>Comments: Yes. Is a 60106 Program. Report is accurate.</p>	1
8	<p>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)</p> <p>Comments: Yes. It describes accomplishments and goals for the future.</p>	1

9	<p>General Comments: Part A scored 7.5 of 9 points. Questions 2 & 5 were NI with point reductions</p> <p>UNGS PROGRESS REPORT REVIEW score is 40 of 50, is a 60106 Partner (-6), Highest percentage of inspectors are in categories I, II, III (-4). No incidents were reported in UNGS for 2022.</p> <p>Daniel W. Bortner, Director, Department of Natural Resources, 402 W. Washington St., Rm. W256, Indianapolis, IN 46204; Christa Phelps, UNGS Program Manager, Patrick Gaume PHMSA.</p>	7.5
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<p>B – PROGRAM INSPECTION PROCEDURES</p> <p>Does State Inspection Plan include procedures that address the following elements? (See Guidelines Section 5.1)</p>		
1	<p>Does State have written inspection procedures?(Yes= 2 points, No= 0 Points, NI=1 point)</p> <p>Comments: Yes. Underground Natural Gas Storage Well Inspection and Incident Investigation Policies and Procedures.</p>	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)</p> <p>Comments: Yes. See VII. Key Inspection Activity Categories, & VIII. Standard (General Code Compliance) Inspection Procedures.</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)</p> <p>Comments: Yes. See VII. Key Inspection Activity Categories, & VIII. Standard (General Code Compliance) Inspection Procedures.</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)</p> <p>Comments: Yes. See VII. Key Inspection Activity Categories, & IX. Construction, Design & Testing Inspection Procedures.</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 VII. Key Inspection Activity Categories, & X. Wellhead Inspections.</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 VII. Key Inspection Activity Categories, & VIII. Standard (General Code Compliance) Inspection Procedures.</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 XV. COMPLIANCE FOLLOW-UP PROCEDURES</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: 49.4 inspection days, 220*.375=82.5 Inspector person days, 49.4/82.5=.60 >.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: NI 3 of 5 points. All IN UNGS inspectors are wait listed for the TQ UNGS Class. 2022 was the 4th year of the UNGS Partnership. 3 points awarded as IN is doing all it can to get the inspectors into the required class.</p>	3
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: NI 1 of 2 points. Noted that the first Standard Inspection was performed in 2022 using IA with the help of PHMSA UNGS Staff. IN UNGS leadership understands that it is critical that they perform their first IA inspection in 2023.</p>	1
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. This is the first year for Christa to be acting in the Program Manager role. It is typical to expect 3 years' experience before training is complete.</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: Yes. Letter was emailed on 1/4/23 and response was received on 2/10/23</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)</p> <p>Comments: okay, still within the first four years. Re-emphasized that the UNGS Standard Inspections must get started.</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: Yes. One Standard inspection was conducted in 2022 with the leadership of the PHMSA Eastern Region UNGS Team. IN DNR personnel participated. The inspection was complete and correctly documented. A IN DNR generated and lead Standard inspection is scheduled to be done in IA during 2023.</p>	2
8	<p>Did State complete all applicable portions of inspection forms? (Yes= 2 points, No= 0 Points, NI=1 point)</p> <p>Comments: yes. The 2022 Standard Inspection was in IA and all applicable portions were completed.</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)</p> <p>Comments: Yes. Items related to the Annual Reports have been reviewed and downloaded. Discussed how the review could be more detailed.</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. Contact and coordination with IN IURC has established that the existing D&A inspections are applicable to INDNR. Copies of the inspections have been received. D&A inspections are current.</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. IDNR follows existing laws and Regulations; Indiana Applied Code (IAC) and Indiana Code (IC). The violation letters contain all information needed for appeal or making payment. See 312 IAC-29 and 312 IAC-30 for UNGS Regulations; also IC 14-37-3-9 which authorizes the IAC regulations. There is a web site at https://www.in.gov/dnr/oil-and-gas .</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, none.</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. IDNR responds to all 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. none.</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. none.</p>	NA
16	<p>General Comments: Part C scored 27 of 31 points. Three questions, 12, 14, &15, were NA: Questions 2, 3, & 4 were NI for a 4 point loss.</p>	27

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)</p> <p>Comments: Yes. As a 60106 Partner have procedures for monitoring and closing probable violations: see Procedures: XVI. PROCEDURES FOR NOTIFYING AN OPERATOR WHEN NON-COMPLIANCE IS IDENTIFIED UNDER A 60106 PROGRAM, XVII. PROCEDURES FOR FOLLOW-UP ACTIVITIES TO ENSURE THAT CORRECTIVE ACTION HAS BEEN TAKEN BY THE OPERATOR WITHIN A SPECIFIC TIMEFRAME AFTER NOTIFICATION OF NON-COMPLIANCE, & XVIII. RECORDKEEPING PROCEDURES TO DOCUMENT THE RESULTS OF INSPECTION, FOLLOW-UP, AND COMPLIANCE ACTIONS TAKEN.</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)</p> <p>Comments: Yes. Found 19 violations of required paperwork that included 5 fines of \$50 each for \$250 total. Violation notices were sent, Fines were received, Operators committed to improving the timeliness for report submissions. All were relative to State Regulations.</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)</p> <p>Comments: Yes, for the Well Head Inspections. Any problems found would have been communicated immediately; no problems in 2019 - 2022. The Standard Inspection in IA had an exit interview.</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)</p> <p>Comments: Yes. Required reports are searched for every quarter, and any absences of reports are emailed/mailed to the operator immediately. Fines if applicable are included in the notice and all fines are received in a timely manner.</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)</p> <p>Comments: Yes. All violations in 2022 were found in a computer review, were notified automatically, and collections were handled through accounts receivable.</p>	2
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)</p> <p>Comments: Yes. IN DNR process is compliant with IN DNR process rules.</p>	2

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. IN DNR is a 60106 Agreement Partner.</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. IN DNR is a 60106 Agreement Partner.</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. IN DNR is a 60106 Agreement Partner.</p>	NA
10	General Comments: Part D scored 17 of 17 points. Questions 7, 8, & 9 were NA.	17

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 Procedures: XIII. Investigating Incidents/Accidents Procedures.</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, IDNR has a 24hr phone number, 317-601-3087 for UNGS. Discussed that Russell was the primary contact for all things UNGS during 2021; backup contacts have been identified. Steve is the primary contact for 2022.</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: NA. No incidents during the history of the Partnership. A process for keeping Incident Records has been developed.</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: NA, No incidents during the history of the Partnership.</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.</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.</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: Yes. IN DNR worked with PHMSA AID, PHMSA UNGS, and IN URC on the Doe Run Storage Field, Perkins #5 Well. IN DNR is ready to help any time.</p>	1
8	<p>Does State share lessons learned from incidents with PHMSA? (Yes= 1 point, No= 0 Points)</p> <p>Comments: Yes. Had extensive communication with PHMSA during the 2020 Doe Run investigation. Discussed that there is not a good Forum for sharing UNGS lessons learned. Lessons learned from the 2020 incident showed that Internal communications and training is needed for personnel, Contact back-up is needed, and prompt reports, morning, mid-day, & evening, are proved as a best practice.</p>	1

9	General Comments: Part E scored 8 of 8 points. Questions 4, 5, & 6 were NA.	8
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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: NI 1 of 2 points. All UNGS operators are also pipeline operators and include the UNGS facilities in their Public Awareness and Damage Prevention Plans. IN URC is the lead Agency for Public Awareness and Damage Prevention inspections. Discussed the need for an Inspector Work Sheet to prompt the inspector to confirm that the operator includes the UNGS Facilities in their Public awareness and Damage Prevention Plans.</p>	1
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. IN is fully participating Public Awareness Programs. IN URC takes a leading role in these activities.</p>	2
3	<p>General Comments: Part F scored 3 of 4 points. Question was NI.</p>	3

G – FIELD INSPECTIONS		
1	Operator, Inspector, Location, Date and PHMSA Representative Comments: Citizens Gas Coke Utility, opid 2392, Doug Kearby, Field Inspector; Howesville Storage Field, Greene County, IN, 6/7/23, Patrick Gaume. Christa Phelps and Beth Hernly also attended.	
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. Devin Gillum with Citizens attended 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. The IN DNR Wellhead Inspection Form.	2
4	Did the inspector thoroughly document results of the inspection? (Yes= 2 points, No= 0 Points, NI=1 Point) Comments: Yes. The document was completed on site.	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. The operator led the way to the well sites and provided access to the wellsites.	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. Field Activities only. The wellhead questions were asked and responded to.	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. Doug has multiple years experience conducting wellhead inspections.	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 an excellent inspection and no violations were found. All facilities and locations were in excellent condition.	1

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. The first Standard Inspection was performed and used IA.</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. The inspection was performed per State Agency procedures.</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: NA. the inspection was 'no violations 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. There have been no SRC.</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, the inspection was 'no violations found'.</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, the inspection was 'no violations found'.</p>	NA
7	<p>General Comments: Part H scored 2 of 2 points. Questions 3-6 were NA.</p>	2