



U.S. Department  
of Transportation  
**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue SE  
Washington DC 20590

# 2022 Gas State Program Evaluation

for

KANSAS 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



# 2022 Gas State Program Evaluation -- CY 2022

Gas

**State Agency:** Kansas

**Agency Status:**

**Date of Visit:** 10/16/2023 - 10/20/2023

**Agency Representative:** Leo Haynos, Chief Engineer  
Suzanne Balandran, Assitant Supervisor

**PHMSA Representative:** Agustin Lopez, State Evaluator

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

**Name/Title:** Andrew J. French, Chairperson

**Agency:** Kansas Corporation Commission

**Address:** 1500 Southwest Arrowhead Road

**City/State/Zip:** Topeka, KS 66604-4027

**Rating:**

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

## INSTRUCTIONS:

Complete this evaluation in accordance with the Evaluator Guidance for conducting state pipeline safety program evaluations. The evaluation should generally reflect state program performance during CY 2022 (not the status of performance at the time of the evaluation). A deficiency in any one part of a multiple-part question should be scored as "Needs Improvement." Determine the answer to the question then select the appropriate point value. If a state receives less than the maximum points, include a brief explanation in the appropriate notes/comments section. If a question is not applicable to a state, select NA. Please ensure all responses are COMPLETE and ACCURATE, and they OBJECTIVELY reflect the state's program performance for the question being evaluated. Increasing emphasis is being placed on how the state pipeline safety programs conduct and execute their pipeline safety responsibilities (their performance). This evaluation, together with selected factors reported in the state's annual progress report attachments, provide the basis for determining the state's pipeline safety grant allocation.

## Scoring Summary

### PARTS

### Possible Points Points Scored

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

0  
15  
10  
50  
15  
10  
0

0  
15  
10  
50  
15  
10  
0

### TOTALS

**100 100**

**State Rating** ..... **100.0**

## PART A - Progress Report and Program Documentation Review

Points(MAX)    Score

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

### Evaluator Notes:

- a. KCC now has jurisdiction over gathering and all transmission operators so the number of operators increased.
- b. Reviewed state database and timesheets to verify tracking of inspection activities.
- c. Reviewed state operator list and PDM to confirm operators.
- d. Had one reportable incident in 2022 that was investigated by the KCC. Inspection is still open and waiting on operator to abandon pipeline involved in incident.
- e. Reviewed compliance action database to confirm compliance actions. Discussed that the number of compliance Carry overs from previous CY's need to match the Number to be corrected from previous year Progress Report.
- f. Records are secured and organized.
- g. Verified qualifications of inspectors in TQ Blackboard.
- h. Have not adopted changes to regulations within 2 years. Working on adopting changes.
- i. Have included past and future performance goals and initiatives.

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



- |   |   |   |   |
|---|---|---|---|
| 1 | Do written procedures address pre-inspection, inspection and post inspection activities for each of the following inspection types: Chapter 5.1<br>Yes = 5 No = 0 Needs Improvement = 1-4   | 5 | 5 |
|   | <ul style="list-style-type: none"> <li>a. Standard Inspections, which include Drug/Alcohol, CRM and Public Awareness Effectiveness Inspections</li> <li>b. TIMP and DIMP Inspections (reviewing largest operator(s) plans annually)</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> <li>g. LNG Inspections</li> </ul> |   |   |

## Evaluator Notes:

Section 5 Inspection and Compliance Program of the Pipeline Safety Section Procedures addresses inspection procedures to provide guidance to inspectors on how to conduct inspections. Section 5.4 Inspections includes inspector guidance on conducting inspections which include; pre-inspection, post-inspection and inspection activities. Exit interview is included as part of the inspection activities. Section 5.5 has details of each type of inspection to give guidance to inspectors.

- |   |  |   |   |
|---|--|---|---|
| 2 | Do written procedures address inspection priorities of each operator, and if necessary each unit, based on the following elements and time frames established in its procedures? Chapter 5.1<br>Yes = 4 No = 0 Needs Improvement = 1-3   | 4 | 4 |
|   | <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:

Section 5.3.1 states each unit will be inspected at least once every three years. Section 5.5.1 has inspection interval of 5 years for standard inspections, TIMP, DIMP, OQ, D&A. Section 5.3 Inspection Priorities includes risk ranking of inspections to prioritize inspections. Data included is date of last inspection, noncompliance history, unaccounted gas, miles of unprotected pipe, miles of bare pipe, and special considerations.

- |   |   |   |   |
|---|---|---|---|
| 3 | (Compliance Procedures) Does the state have written procedures to identify steps to be taken from the discovery to resolution of a probable violation? Chapter 5.1<br>Yes = 3 No = 0 Needs Improvement = 1-2  | 3 | 3 |
|   | <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:

Section 5.8 has detailed procedures for notifying an operator of noncompliance and provides step to resolve probable violations. Section 5.9 provides follow-up procedures to resolve non-compliance issues.

- |   |  |   |   |
|---|--|---|---|
| 4 | (Incident/Accident Investigations) Does the state have written procedures to address state actions in the event of an incident/accident?<br>Yes = 3 No = 0 Needs Improvement = 1-2 | 3 | 3 |
|   | <ul style="list-style-type: none"> <li>a. Mechanism to receive, record, and respond to operator reports of incidents, including after-hours reports</li> </ul>                     |   |   |

- 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:

Section 6.1 provides a mechanism for recording and actions in the event of an incident. Operators call the Commission during business hours and are given a list of the inspectors phone numbers to contact after hours.

---

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

The KCC is mainly complying with Part B of the evaluation.

---

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<br>Yes = 5 No = 0 Needs Improvement = 1-4  | 5 | 5 |
|   | <ul style="list-style-type: none"><li>a. Completion of Required OQ Training before conducting inspection as lead</li><li>b. Completion of Required DIMP/IMP Training before conducting inspection as lead</li><li>c. Completion of Required LNG Training before conducting inspection as lead</li><li>d. Root Cause Training by at least one inspector/program manager</li><li>e. Note any outside training completed</li><li>f. Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector (Reference State Guidelines Section 4.3.1)</li></ul> |   |   |

Evaluator Notes:

Verified qualifications in TQ Blackboard to assure inspectors are qualified to lead inspections. Gas Qualified- Balandran, Bolinder, Fulkerson, Haynos, Hertlein, Powers, Schumacher. TIMP Qualified-Bolinder, Powers.DIMP- Bolinder, Powers, Schumacher.

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

Evaluator Notes:

Yes, Leo Haynos is knowledgeable of the pipeline safety program and regulations.

- |   |  |           |           |
|---|--|-----------|-----------|
| 3 | General Comments:<br>Info Only = No Points | Info Only | Info Only |
|---|--|-----------|-----------|

Evaluator Notes:

The KCC is mainly complying with Part C of the evaluation.

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



## PART D - Program Performance

Points(MAX) Score

- |   |   |   |   |
|---|---|---|---|
| 1 | Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1<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. Part 193 LNG Inspections</li><li>f. Construction (did state achieve 20% of total inspection person-days?)</li><li>g. OQ (see Question 3 for additional requirements)</li><li>h. IMP/DIMP (see Question 4 for additional requirements)</li></ul> |   |   |

Evaluator Notes:

Yes reviewed randomly selected inspection reports to verify time intervals were met and completeness of reports. There are no jurisdictional LNG facilities in Kansas.

- |   |   |    |    |
|---|---|----|----|
| 2 | Did inspection form(s) cover all applicable code requirements addressed on Federal Inspection form(s)? Did State complete all applicable portions of inspection forms? Chapter 5.1. Do inspection records indicate that adequate reviews of procedures, records and field activities, including notes and the appropriate level of inspection person-days for each inspection, were performed?<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. Part 193 LNG Inspections</li><li>f. Construction</li><li>g. OQ (see Question 3 for additional requirements)</li><li>h. IMP/DIMP (see Question 4 for additional requirements)</li></ul>  |    |    |

Evaluator Notes:

Reviewed randomly selected inspection reports. Use state form for standard inspections and IA equivalent for all other types of inspections.

- |   |  |   |   |
|---|--|---|---|
| 3 | Is state verifying monitoring (Protocol 9/Form15) of operators OQ programs? This should include verification of any plan updates and that persons performing covered tasks (including contractors) are properly qualified and requalified at intervals established in the operator's plan. 49 CFR 192 Part N<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Yes conduct OQ inspections and Protocol 9 inspections to verify compliance with regulations.

- |   |   |   |   |
|---|---|---|---|
| 4 | Is state verifying operator's integrity management Programs (IMP and DIMP)? This should include a review of plans, along with monitoring progress. In addition, the review should take in to account program review and updates of operator's plan(s). 49 CFR 192 Subparts O and P<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><li>b. Are states verifying with operators any plastic pipe and components that have shown a record of defects/leaks and mitigating those through DIMP plan?</li><li>c. Are the states verifying operators are including low pressure distribution systems in their threat analysis?</li></ul> |   |   |

Evaluator Notes:

Yes, IMP are conducted within 5 year intervals of all operators. Standard inspection form has Integrity Managment section which asks if HCA's have changed and when the plan was reviewed which are conducted on yearly basis on large operators.

- |   |   |   |   |
|---|---|---|---|
| 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<br>Yes = 2 No = 0 Needs Improvement = 1  | 2 | 2 |
|   | a. Operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken;<br>b. Operator procedures for surveillance of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leakage history, or other unusual operating maintenance condition? (Note: See GPTC Appendix G-18 for guidance);<br>c. Operator emergency response procedures for leaks caused by excavation damage near buildings and determine whether the procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings Refer to 4/12/01 letter from PHMSA in response to NTSB recommendation P-00-20 and P-00-21;<br>d. Operator records of previous accidents and failures including reported third-party damage and leak response to ensure appropriate operator response as required by 192.617;<br>e. Directional drilling/boring procedures of each pipeline operator or its contractor to determine if they include actions to protect their facilities from the dangers posed by drilling and other trench less technologies;<br>f. Operator procedures for considering low pressure distribution systems in threat analysis?<br>g. Operator compliance with state and federal regulations for regulators located inside buildings? |   |   |

Evaluator Notes:

Yes, the KCC has incorporated the NTSB recommendations into their inspection forms (Distribution Records and Procedures Guide). Cast iron was all removed but Kansas Gas Service found .2 miles when they took over operations of Ft. Riley distribution system. KCC is aware of the newly found cast iron. Questions 91 and 92 on standard forms address low pressure systems.

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

Evaluator Notes:

Discuss during yearly seminars and website as link to PHMSA website. In 2019, time was spent with the large operators looking at their inside meter sets and addressed during their inspections. Only the large operators have inside sets. ADB-2020-02 (Low Pressure Systems) was addressed with large operators during their inspections in 2020. This was also addressed in the 2019 municipal workshops. The KCC has added questions to their inspection guides to address ADBs.

- |   |   |    |    |
|---|---|----|----|
| 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<br>Yes = 10 No = 0 Needs Improvement = 1-9   | 10 | 10 |
|   | a. Were compliance actions sent to company officer or manager/board member if municipal/government system?<br>b. Were probable violations documented properly?<br>c. Resolve probable violations<br>d. Routinely review progress of probable violations<br>e. Did state issue compliance actions for all probable violations discovered?<br>f. Can state demonstrate fining authority for pipeline safety violations?<br>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)<br>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:**

Yes, reviewed randomly selected inspection reports with corresponding compliance actions to verify compliance actions are processed in a timely manner. Compliance actions were sent to company officials within the required 90 days and exit interview within 30 days.

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

Reviewed investigation report for one incident involving Midcontinent Marketcenter. The incident investigation is still on going and waiting on the pipeline to be abandoned.

<b>9</b>	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 Yes = 1 No = 0 Needs Improvement = .5	<b>1</b>	<b>1</b>
----------	---	----------	----------

**Evaluator Notes:**

Yes, responded within the 60 day requirement.

<b>10</b>	Did State conduct or participate in pipeline safety training session or seminar in Past 3 Years? Chapter 8.5 Info Only = No Points	<b>Info Only</b>	<b>Info Only</b>
-----------	---	------------------	------------------

**Evaluator Notes:**

Conduct yearly seminar in Manhattan. Last year was in Oct 26-27, 2022.

<b>11</b>	Has state confirmed transmission operators have submitted information into NPMS database along with changes made after original submission? Info Only = No Points	<b>Info Only</b>	<b>Info Only</b>
-----------	--	------------------	------------------

**Evaluator Notes:**

Question 23 of Transmission inspection form covers NPMS updates and reporting

<b>12</b>	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). Yes = 1 No = 0 Needs Improvement = .5	<b>1</b>	<b>1</b>
-----------	--	----------	----------

**Evaluator Notes:**

Send out quarterly newsletter. Provide workshops to municipalities. Have pipeline safety information on website.

<b>13</b>	Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.7 Yes = 1 No = 0 Needs Improvement = .5	1	1
Evaluator Notes: No SRCR in 2022.			
<b>14</b>	Was the State responsive to: Yes = 1 No = 0 Needs Improvement = .5 a. Surveys or information requests from NAPSRS or PHMSA; and b. PHMSA Work Management system tasks?	1	1
Evaluator Notes: Yes, respond to notification from PHMSA and NAPSRS surveys.			
<b>15</b>	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. Yes = 1 No = 0 Needs Improvement = .5	1	1
Evaluator Notes: Discussed waivers listed on PHMSA website. August 17, 2009- Loisburg waiver PHMSA denial unless provisions are met. (never installed) May 17 2017 - Kansas Gas fusion waiver. 15 month to requalify. With requalification provision (if 1 join failure must requalify). April 2, 2003- Greeley Gas has same joining waiver.( rule change makes no longer a waiver)			
<b>16</b>	Were pipeline program files well-organized and accessible? Info Only = No Points	Info Only	Info Only
Evaluator Notes: Yes, keep inspection reports electronically in Pipeline Safety Database System (PSDS)			
<b>17</b>	Discussion with State on accuracy of inspection day information submitted into State Inspection Day Calculation Tool (SICT). Has the state updated SICT data? Yes = 3 No = 0 Needs Improvement = 1-2	3	3
Evaluator Notes: No issues or concerns in meeting days. Discussed the need for completeness of data.(risks)			
<b>18</b>	Discussion on State Program Performance Metrics found on Stakeholder Communication site.\ <a href="http://primis.phmsa.dot.gov/comm/states.htm?nocache=4805">http://primis.phmsa.dot.gov/comm/states.htm?nocache=4805</a> Info Only = No Points	Info Only	Info Only
Evaluator Notes: Discussed Program Performance Metrics and there seems to be no negative trends or irregular data. Damages per 1,000 tickets are below national average.			
<b>19</b>	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 = No Points a. <a href="https://pipelinesms.org/">https://pipelinesms.org/</a> b. Reference AGA recommendation to members May 20, 2019	Info Only	Info Only
Evaluator Notes: PSMS is discussed during inspections. Question 32 on inspection form mentions PSMS.			
<b>20</b>	General Comments: Info Only = No Points	Info Only	Info Only
Evaluator Notes:			

The KCC is mainly complying with Part D of the evaluation.

---

Total points scored for this section: 50  
Total possible points for this section: 50



## PART E - Field Inspections

Points(MAX) Score

- 1 Operator, Inspector, Location, Date and PHMSA Representative (enter specifics into the comments box below) Info Only Info Only

Info Only = No Points

- What type of inspection(s) did the state inspector conduct during the field portion of the state evaluation? (i.e. Standard, Construction, IMP, etc)
- When was the unit inspected last?
- Was pipeline operator or representative present during inspection?
- Effort should be made to observe newest state inspector with least experience

### Evaluator Notes:

City of Denison

Wade Schumacher, Pipeline Safety Inspector

Denison, KS

October 17, 2023

Agustin Lopez, PHMSA State Evaluator

- Evaluated Wade Schumacher while conducting a standard inspection of the City of Denison distribution system.
- 2022 was last inspection.
- Yes, pipeline representative was present.
- Have not evaluated Wade Schumacher in the past.

- 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:

Yes, inspection form was utilized by the inspector while conducting the inspection.

- 3 Did the inspector adequately review the following during the inspection 10 10

Yes = 10 No = 0 Needs Improvement = 1-9

- Procedures (were the inspector's questions of the operator adequate to determine compliance?)
- Records (did the inspector adequately review trends and ask in-depth questions?)
- Field Activities/Facilities (did inspector ensure that procedures were being followed, including ensuring that properly calibrated equipment was used and OQ's were acceptable?)
- Other (please comment)
- Was the inspection of adequate length to properly perform the inspection?

### Evaluator Notes:

- Yes, inspector reviewed procedures to verify compliance.
- Yes, inspector reviewed records thoroughly.
- A field inspection was conducted to inspect pipeline facilities.
- No other type of inspection was performed.
- Yes the length of inspection was adequate.

- 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:

Yes, Wade Schumacher was knowledgeable of the pipeline safety program. Reviewed O&M manual and records with great detail and was very observant in the field.

- 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:

Yes, the inspector concluded the inspection with an exit interview with the operator. Discussed issues found that would be followed up the next day by the inspector.

---

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

Info Only Info Only

Info Only = No Points

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

Evaluator Notes:

Yes, the inspection was performed in a safe, positive and constructive manner.

---

7 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

Wade Schumacher conducted a standard inspection of the City of Denison distribution system. He conducted a thorough inspection and explained to operator all the applicable regulations in order to be in compliance. He demonstrated knowledge of the pipeline safety regulations.

---

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**

- |          |  |   |   |
|----------|--|---|---|
| <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:**

Data sheet of pipeline system is submitted to state annually and reviewed along with annual reports to verify accuracy and for trends.

- |          |  |   |   |
|----------|--|---|---|
| <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:**

Yes, review excavation damages by operators. Big three operators all notify the KCC of each damage to their facilities due to a previous ordered to one of the operators. An example of KCC taking action is an issued order to Kansas Gas Service for locating practices being insufficient. KGS had to incorporate several items to their locating practices as ordered per the KCC. Also issued civil penalties which are being used for education in three state schools that provide excavator training for excavators.

- |          |   |   |   |
|----------|---|---|---|
| <b>3</b> | Has the state reviewed the operator's annual report pertaining to Part D - Excavation Damage?<br>Yes = 4 No = 0 Needs Improvement = 1-3 <ol style="list-style-type: none"><li>a. Is the information complete and accurate with root cause numbers?</li><li>b. Has the state evaluated the causes for the damages listed under "One-Call Notification Practices Not Sufficient" (Part D.1.a.)?</li><li>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?</li><li>d. Is the operator or its locating contractor(s) qualified and following written procedures for locating and marking facilities?</li><li>e. Is the operator appropriately requalifying locators to address performance deficiencies?</li><li>f. What is the number of damages resulting from mismarks?</li><li>g. What is the number of damages resulting from not locating within time requirements (no-shows)?</li><li>h. Is the operator appropriately addressing discovered mapping errors resulting in excavation damages?</li><li>i. Are mapping corrections timely and according to written procedures?</li><li>j. Has the state evaluated the causes for the damages listed under "Excavation Practices Not Sufficient" (Part D.1.c.)?</li></ol> | 4 | 4 |
|----------|---|---|---|

**Evaluator Notes:**

Data sheet of pipeline system is submitted to state annually and reviewed along with annual reports to verify accuracy which include Part D of the annual report. Have issued and order to KGS and Atmos to report all damages to their facilities which demonstrates being proactive to reduce damages by investigations and analyzing all damages.

- |          |   |   |   |
|----------|---|---|---|
| <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 <ol style="list-style-type: none"><li>a. What stakeholder group is causing the highest number of damages to the pipelines? Operator, contractor, locating company or public.</li><li>b. Has the state verified the operator is appropriately focusing damage prevention education and training to stakeholders causing the most damages?</li></ol> | 2 | 2 |
|----------|---|---|---|

- 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:

Damages is tracked by the KCC and the damages per 1,000 is used for the yearly budget which also shows any negative trends.

---

**5** General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

The KCC is mainly complying with Part F of the evaluation.

---

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



## PART G - Interstate Agent/Agreement States

Points(MAX) Score

- 1 Were all inspections of interstate pipelines conducted using the Inspection Assistant program for documenting inspections? Info Only Info Only  
Info Only = No Points

Evaluator Notes:

KS CC 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:

KS CC 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:

KS CC 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:

KS CC 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:

KS CC 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:

KS CC is not an interstate agent and does not have a 60106 agreement with PHMSA.

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