

**PHMSA UNDERGROUND NATURAL GAS STORAGE (UNGS)
MS PSC PROGRAM EVALUATION – CY2022
CONDUCTED 5/8-10/2023**

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TOTAL PROGRAM EVALUATION POINTS	93 of 96 (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, .5 of 1 point. Through discussion we determined that all 16 UNGS categories should show 60105 authority, and that the 8 wells in two facilities are best described as a single Unit. The report will be unchanged for this year but corrected for the CY 2023 progress Report.</p>	.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: NI, .5 of 1 point. Discussed that better record keeping is needed to justify the time splits between Gas and UNGS programs. MS committed to a spreadsheet to better describe the time splits between the programs.</p>	.5
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. 1 of 1 point. Attachment 3 agrees with MS UNGS records.</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. 1 of 1 point. Attachment 5 agrees with MS UNGS records. The UNGS inspection and associated compliance action was reviewed.</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: Yes. 2 of 2 points. The MS UNGS records are electronic and were reviewed and shown to be accessible.</p>	2
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, 1 of 1 point. All 3 inspectors have the required UNGS classes. Discussed to better count UNGS inspector time.</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. 1 of 1 point. Everything except \$2M/\$200K penalties are adopted.</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. 1 of 1 point. Attachment 10 questions were answered. Discussed that additional detail might be better.</p>	1

9	<p>General Comments: Mr. Dane Maxwell, Chairman Mississippi Public Service Commissioner PO Box 1174 Jackson, MS 39215</p> <p>UNGS PROGRESS REPORT REVIEW score is 40 of 50 points. (-8) 50% of inspectors are in cat. 3-5. (-2) Civil Penalties are inadequate.</p> <p>No incidents for UNGS 2020-2022.</p> <p>Part A scored 8 of 9 points. Questions 1 & 2 were NI for a total reduction of 1-point.</p>	9
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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)</p> <p>Comments: Yes. UNGS has been added into the existing Gas Pipeline Safety 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 Section 5.1, of the 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 Section 5.1, of the 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 Section 5.1, of the 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: NA. Wellhead inspections are included in the Standard Inspections.</p>	NA
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 5.1, of the 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 Section 4.1.1, of the Procedures.</p>	5
8	<p>General Comments: Part B scored 13 of 13 points. Question 5 was NA.</p>	13

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)</p> <p>Comments: Yes. 7 inspection days, 220*.022=4.8 Inspector person days, 7/4.8=1.47 >.38, okay. Discussed the need to better count UNGS inspector time.</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. 2022 was the first year of the UNGS partnership and all 3 inspectors are already trained. 5-year clock for Program Manager training has started.</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: NI. 1 of 2 points. The printed version of the IA Form is being used, but MS personnel need experience to use the IA Program.</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. 1of 2 points. This is the first year for a new program and there is a learning curve going from a single Grant program to a two Grant Program with necessary additional documentation of personnel time.</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: NA. 2022 is the first year for the MS UNGS Partnership.</p>	NA
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. MS is on track to complete all needed UNGS inspections in their 2-year interval per their procedures.</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. A complete Standard Inspection is in Progress. The majority was completed as a Special Inspection in 2022.</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 Special Inspection was completed as planned.</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. The 2022 annual report was reviewed and will be a topic of discussion during the Field Inspection.</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. Atmos D&A is performed through the Gas Partnership and the inspection will be uploaded into IA within the inspection interval.</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. Annual pipeline safety seminars in LA and MS. LA had an UNGS Breakout section with numerous presentations. The MS PSC website is available to the public, and Public Records can be made 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. No UNGS SRCR.</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. MS PSC is our Gas PL Safety Partner and responds to all PHMSA and NAPSR 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.</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.</p>	NA
16	<p>General Comments: Part C scored 27 of 29 points. Four questions were NA (5,12,14,15); 2 questions were NI (3,4).</p>	29

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. 4 points. See Procedures 5.1 Inspections and Part 4 on Page 41-43 for procedures. Need to include the Show Cause and Appeal to the Commission directions into something readily available; and Procedures 5.2 Compliance, the Appeals paragraph. Discussed that the MS PSC Procedures are based on Guidelines for States Participating in the Pipeline Safety Program and discussed further that they should be personalized for the MS PSC Pipeline Safety Department, i.e. to replace 'State Agency' with 'PSC Pipeline Safety Department', and insert MS phone numbers, email addresses, addresses, & directions for inserting paragraphs informing operators of their options for appeal or show cause as appropriate.</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. All courtesies were given to the operator and Atmos quickly came into compliance.</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. The inspection noted that an Exit interview was given that detailed the findings of the inspection.</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. The formal letter of violation was sent within 60 days.</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. The inspection found one violation and MS sent a notice letter for that violation.</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. Atmos responded and came into compliance quickly.</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: Yes. Rickey is very familiar with PSC process for imposing civil penalties.</p>	2
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: Yes. The 2022 violation was for a small correction of procedures and no violation was needed.</p>	2
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: Yes. MS PSC has used fines in its Gas Program within the last three years.</p>	1
10	General Comments: Part D scored 21 of 21 points.	21

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 6.1 Incident Investigation and Safety Related Conditions. Discussed that the MS PSC Procedures are based on Guidelines for States Participating in the Pipeline Safety Program and discussed further that they should be personalized for the MS PSC Pipeline Safety Department, i.e. to replace ‘State Agency’ with ‘PSC Pipeline Safety Department’, and insert MS phone numbers, email addresses, addresses, & directions for inserting paragraphs informing operators of their options for appeal or show cause as appropriate.</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. All operators are aware of the NRC number 1.800.424.8802, and the MS PSC website, Pipeline Safety section, shows the name, phone, and email of all Pipeline Safety managers and Inspectors.</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. The UNGS incident records will be kept essentially the same as the Gas Pipeline incidents.</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 UNGS incidents</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. No requests in 2022, but MS PSC will cooperate anytime they are requested.</p>	1
8	<p>Does State share lessons learned from incidents with PHMSA? (Yes= 1 point, No= 0 Points)</p> <p>Comments: Yes. During Southern Region NAPSIR Meetings, and with reports to AID.</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: Yes. See Section 7 in the procedures. MS PSC has an active Damage Prevention program and is in contact with operators concerning Damage Prevention.</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 during Pipeline Safety seminars and bi-monthly area Damage Prevention Council meetings.</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: Atmos Energy, opid 12582, Goodwin Storage Field facility, & 2 nearby wells. Joyce Beal-Team Lead Inspector, 30049 Clay Hill Rd. Nettleton, Mississippi 38858, 5/10/23, Patrick Gaume. Rickey Cotton, Program Manager, is also in attendance.	
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. Five Atmos 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. The Observation questions in the IA form were used for this inspection.	2
4	Did the inspector thoroughly document results of the inspection? (Yes= 2 points, No= 0 Points, NI=1 Point) Comments: Yes. Joyce used a paper copy of the IA questions and documented the inspection.	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 included PPE, tools, and transport to the sites inspected.	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 a Field inspection.	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. Joyce demonstrated knowledge of her inspector job responsibilities.	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 facilities were in good order. Everything in the field was fine. Atmos needs to report what the maximum wellhead pressure should be for a 1387 maximum bottom hole pressure in the formation. Made a recommendation to erect vehicle barriers around some valve risers, and to increase the test frequency of the gas produced from the UNGS facility. Discovered	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: H1-6; NA, not a 60106 Agreement Partner.</p>	NA
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: H1-6; NA, not a 60106 Agreement Partner.</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: H1-6; NA, not a 60106 Agreement Partner.</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: H1-6; NA, not a 60106 Agreement Partner.</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: H1-6; NA, not a 60106 Agreement Partner.</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: H1-6; NA, not a 60106 Agreement Partner.</p>	NA
7	<p>General Comments: Part H is NA, not a 60106 Agreement Partner. Part H scored 0 of 0 points</p>	NA