



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

Oklahoma 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:** Oklahoma

**Agency Status:**

**Date of Visit:** 08/22/2023 - 08/24/2023

**Agency Representative:** Dennis Forthergill, Kelly Phelps, Randy Snyder, Billy Anglin

**PHMSA Representative:** Joe Subsits

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

**Name/Title:** Todd Hiatt, Chair

**Agency:** Oklahoma Corporation Commission

**Address:** 2401 N. Lincoln Blvd.

**City/State/Zip:** Oklahoma City, OK 73105

**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. There are 16 private systems, one less than last year, 53 municipal, one less than last year, 85 master meters four less than last year, 50 transmission five less than last year, and 40 gathering one more from last year. The Progress report operator numbers match the PIPES data base.
- b. There were 1603 days inspection days. 353 of those days were construction days. SICT days for 2022 were 1259 days. 28% of gas days were construction days. Inspection days match the OCC data base.
- c. Unit numbers in attachment 1 and 3 match.
- d. The progress report and WMS identify 7 federally reportable incidents in 2022. Two of the incidents were from gathering systems.
- e. The number of probable violation correctly carries over from previous year. Compliance categories added up correctly. Compliance numbers come from the PIPES database.
- f. Records were readily retrievable during the audit. A hard copy of the records is still maintained.
- g. Inspectors qualifications were checked on blackboard. Gas, liquids and underground storage add up to 100 % for each person.
- h. Federal regulations are adopted within 2 years of effective date.
- i. 2022 accomplishments were annual reports and damage prevention reviews completed and two additional staff were hired.

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



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|---|---|---|---|
| 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 <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> | 5 | 5 |
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## Evaluator Notes:

Pre-inspection, inspection and post inspection procedures are on page 6. Risk priority is mentioned on page 7. OCC requires a portion large operators to be inspected annually on page 7. The Commission also places inspection priority on systems with lower pipeline expertise such as master meters and municipal systems on page 7. Problem operator also can be subject to a higher inspection frequency as stated on page 11. Inspection forms to be used are mentioned in the General Provisions section on page 14." Page 14 states current Federal inspection forms or equivalent form are to be used.

- a. Standard inspections are addressed on page 4. Drug/Alcohol, public Awareness and CRM inspections are addressed on page 4 and 5.
- b. TIMP and DIMP inspections are addressed on page 5. Page 10 requires annual review of integrity management implementation of the largest liquid and gas operators. DIMP is addressed on page 11.
- c. OQ inspections are covered on pages 8-9.
- d. Damage prevention inspections are addressed on page 5 of the procedures.
- e. On-site training is covered on page 15.
- f. Construction inspections are scheduled on page 4.
- g. There is no LNG in Oklahoma.

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| 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 <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> | 4 | 4 |
|---|---|---|---|

## Evaluator Notes:

Risk priorities are mentioned on page 7 - 11 of the procedures. OCC requires large operator to have a portion of their system to be inspected annually on page 7. The Commission also places inspection priority on systems with lower pipeline expertise such as master meters and municipal systems on page 7. Problem operator also can be subject to a higher inspection frequency as stated on page 11. Inspection form to be used are mentioned in the General Provisions section on page 14.

- a-e Prioritization considerations are addressed on page 11-12.
- f. Units based on regional office areas. Large units are broken and portions of the unit are inspected annually.

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| 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 |
|---|--|---|---|

- a. Procedures to notify an operator (company officer) when a noncompliance is identified
- b. Procedures to routinely review progress of compliance actions to prevent delays or breakdowns
- c. Procedures regarding closing outstanding probable violations

Evaluator Notes:

Compliance procedures are on page 13-14. Contempt hearings are mentioned on page 4. The hearing will be used to address due process and non compliance issues.

- a. Finalization of inspection results is required within 90 days as addressed on page 13. Requirements to conduct exit interview before 30 days is on page 6. Page 14 states that letters will be submitted to appropriate officials.
- b. Annual review of long term compliance issues is found on page 15.
- c. Conditions for close out are addressed on page 14-15.

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4	(Incident/Accident Investigations) Does the state have written procedures to address state actions in the event of an incident/accident?	3	3
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Yes = 3 No = 0 Needs Improvement = 1-2

- a. Mechanism to receive, record, and respond to operator reports of incidents, including after-hours reports
- 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:

Telephonic notifications caused by equipment failures which result in hospitalization, death or fire will use the Federal incident /accident form.

- a. Taking incident calls is addressed on page 11. Page 11 of procedure addresses when telephonic investigations are performed.
- b. The inspector always goes on-site if there is a federally reportable incident. This is addressed on Page 12.

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5	General Comments:		Info Only Info Only
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Info Only = No Points

Evaluator Notes:

There are no issues with part B.

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Total points scored for this section: 15  
Total possible points for this section: 15



## PART C - State Qualifications

Points(MAX) Score

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|---|---|---|---|
| 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:

Personnel training records are tracked using T&Q blackboard. New personnel are mentored and ride with experienced inspectors until they are trained. The following inspectors completed their core classes: Steven Bibb, Bruce Cambell, Vince Eitzen, Dennis Fothergill, John Harper, Chad Holiday, Randy Kirkegard, Rick Mathews, Dustin Merriman, Chance Nestell, Jeff Overbay, Kelly Phelps, Mitchel Skinner, Randy Snyder and Don Taxton All inspectors were qualified except for Casey Roberts, Larry Sackett, Terra Wright and Billy Anglin are not gas core qualified. No issues were noted. New inspectors work with experienced personnel during training period.

- a.) Inspectors qualified to conduct OQ inspections are Stevn Bibb, Bruce Cambell, Vince Eitzen, John Harper, Chad Holiday, Randy Kirkegard, Rick Mathews, Dustin Merriman, Jeff Overbay, Kelly Phelps, Mitchel Skinner, Randy Snyder and Billy Anglin
- b.) Inspector that are Gas IMP qualified are Bruce Cambell, John Harper, Chad Holiday, Randy Kirkegard, Rick Mathews, Dustin Merriman, Jeff Overbay, Kelly Phelps, Mitchel Skinner and Randy Snyder.
- c.) There is no LNG in Oklahoma
- d.) Root cause training has been taken by Steven Bibb, Bruce Cambell, Vince Eitzen, John Harper, Chad Holiday, Randy Kirkegard, Rick Mathews, Dustin Merriman, Jeff Overbay, Mitchel Skinner, Randy Snyder, Don Taxton and Billy Anglin.
- e.) conducted hazwopper refresher last year.
- f.) Inspector were qualified to do the inspections they performed.

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| 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 |
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### Evaluator Notes:

Dennis Fothergill is qualified to do the core inspection work. He has been the with the pipeline safety program for 35 years. He has a good understanding of pipeline safety issues. No issues were noted.

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

### Evaluator Notes:

There are no issues with Part C.

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

1	Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1 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:

OCC inspected operators for all types of inspections. Inspections were within the 5-year frequency. The five year frequency is approaching for West Texas Gas Drug and Alcohol inspections. This is an interstate facility for OCC but also operates as an interstate operator. The Drug and Alcohol inspection frequencies for interstate operators is managed by PHMSA so OCC is not accountable for Drug and Alcohol inspection frequencies for West Texas Gas.

- a. Standard inspections for operators on the random inspection list were found to be within the required inspection frequencies.
- b. Public Awareness inspections for operators on the random inspection list were found to be within the required inspection frequencies.
- c. Drug and Alcohol inspections for operators on the random inspection list were found to be within the required inspection frequencies.
- d. Control Room Management inspections for operators on the random inspection list were found to be within the required inspection frequencies.
- e. There is no LNG in Oklahoma.
- f. OCC had 353 inspection days and met the 20% inspection day requirement.
- g. Operator Qualification inspections for operators on the random inspection list were found to be within the required inspection frequencies.
- h. IMP and DIMP inspections for operators on the random inspection list were found to be within the required inspection frequencies.

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? 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:

OCC uses IA for programmatic inspection and the IA equivalent for standard inspections.

- a. Standard inspection forms were filled out correctly and completely.
- b. Public Awareness inspection forms were filled out correctly and completely.
- c. Drug and Alcohol inspection forms were filled out correctly and completely.
- d. Control Room Management inspection forms were filled out correctly and completely.
- e. There is no LNG in Oklahoma.
- f. OCC uses a federal and state forms for construction.

- g. Operator Qualification inspection forms were filled out correctly and completely.
- h. IMP/TIMP inspection forms were filled out correctly and completely.

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 Yes = 2 No = 0 Needs Improvement = 1	2	2
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Evaluator Notes:

Programmatic Operator Qualification inspections were conducted as required. Protocol 9 inspections are performed during standard inspections.

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 Yes = 2 No = 0 Needs Improvement = 1 <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>	2	2
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Evaluator Notes:

OCC regularly inspects and evaluated IMP/DIMP programs.

- a. The largest operators receive an annual review which provides a HCA management and implementation review. These reviews are tracked by Billy Anglin. Largest operator's are determined by operator mileage. IA question are used to review annual IM reports.
- b. This issue is addressed in IA considerations. There is no cast iron in Oklahoma. The biggest problem is cold fusion on poly pipe. There is 215 miles of bare steel in Oklahoma. The bare steel has not been problematic.
- c. An e-mail was sent to operators to confirm that the low-pressure systems are evaluated as a DIMP threat. This threat is part of threat analysis. This is looked at during the DIMP inspection.

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 Yes = 2 No = 0 Needs Improvement = 1 <ul style="list-style-type: none"> <li>a. Operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken;</li> <li>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);</li> <li>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;</li> <li>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;</li> <li>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;</li> <li>f. Operator procedures for considering low pressure distribution systems in threat analysis?</li> <li>g. Operator compliance with state and federal regulations for regulators located inside buildings?</li> </ul>	2	2
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Evaluator Notes:

- a. There is no cast iron in Oklahoma



- b. There is no cast iron in Oklahoma
- c. Procedures to address multiple leaks adjacent to nearby buildings is addressed as an addendum question on the States checklist
- d. 192.617 is addressed during accidents investigations
- e. Directional bore damage prevention procedures are addressed as addendum questions on the State checklist
- f. Low pressure distribution recommendation was addressed by a mailing the bulletin to operators
- g. A letter with the bulletin was also sent to operators to inform operators about precautions to consider for indoor regulators.

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

Evaluator Notes:

John Harper used an advisory bulletin spreadsheet which tracked advisory bulletins.

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

- a. Were compliance actions sent to company officer or manager/board member if municipal/government system?
- b. Were probable violations documented properly?
- c. Resolve probable violations
- d. Routinely review progress of probable violations
- e. Did state issue compliance actions for all probable violations discovered?
- f. Can state demonstrate fining authority for pipeline safety violations?
- 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)
- 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:

- a. Compliance actions are sent to the chief executive officer.
- b. Violations that were reviewed during the random inspection review were properly documented.
- c. Violations were properly resolved.
- d. Violations are tracked on the PIPES system which allow open violations to be tracked.
- e. All reviewed probable violations were subject to the compliance process.
- f. Staff recommended penalties this year, but the Commissioners disagreed. Staff is still working on modifying the order.
- g. Supervisors provide oversight of the inspector's compliance work. Violations are tracked on the PIPES system. Letters are ultimately signed and approved by Dennis.
- h. There were two show cause hearings last year.
- i. Exit interviews are conducted on the last day of the inspection.
- j. Written notice is received within 90 days.

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

- 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:**

There were 5 gas incidents in 2022 and 2 gas gathering system incidents. Gas incidents are 1/20/22 by Oklahoma natural gas, archaea on 4/14/2022, 1/21/22 by Enable, 2/26/22 by Oneok and 10/24/22 by Enable.

- a. An inspector is assigned to serve 24 hour on call duty to receive incident notifications. Kelly is notified when the Federal Threshold is met.
- b. Email notifications are the notification record.
- c. Someone was onsite for all incidents. OCC knows they need a justification memo if nobody goes on-site.
- d-f. Though there were no issues, Oklahoma was asked to expand on documentation of observations, contributing factors and recommendations.
- g. Compliance actions were initiated for Achaea. A compliance letter sent, response received, all violations written up. This event was recommended for enforcement to the Commissioners.
- h. AID sends reports to OCC for corrections.
- i. Lessons are learned at the SW Regional NAPSIR meeting. Presentations are also given at the Damage Prevention Expo, Oklahoma Gas Assn, and Small Operator training sessions.

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| <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<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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**Evaluator Notes:**

The 5/20/22 letter to Ms. Dana Murphy did not require a response since there were no issues. Todd Hiatt is the current chair,

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| <b>10</b> | Did State conduct or participate in pipeline safety training session or seminar in Past 3 Years? Chapter 8.5<br>Info Only = No Points | Info Only | Info Only |
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**Evaluator Notes:**

The last seminar was 2019. A 2021 seminar was cancelled due to lack of interest to travel from operators due to covid. The seminar has been rescheduled for November 2022.

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

NPMS updates are addressed in the transmission checklist. John Harper also tracks this activity on a spreadsheet. The spreadsheet identifies the tracking status of mapping notices. John also calls Washington DC to confirm that notices have been made.

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| <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).<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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**Evaluator Notes:**

The Commission communicates with stakeholders through the web page. The web page has a complaint and question form, regulations, and contact information. Staff also does e-mail blasts when important information needs to be disseminated.

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| <b>13</b> | Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.7<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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**Evaluator Notes:**

There were no gas SRCs in 2022. Documentation would be in the form of an inspection report.

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| <b>14</b> | Was the State responsive to:<br>Yes = 1 No = 0 Needs Improvement = .5<br>a. Surveys or information requests from NAPSR or PHMSA; and<br>b. PHMSA Work Management system tasks? | 1 | 1 |
|-----------|--|---|---|

Evaluator Notes:

- a. The Commission responds to NAPSR surveys. Typically Dennis seeks input from field personnel prior to filling out the survey monkey. Dennis produced a copy of survey documentation.
- b. Dennis Oversees and periodically checks IMP notifications and WMS activity? There were 4 open WMS items.

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| <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.<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

There was a waiver request on 3/17/08. There was a request to grandfather Centerpoint low pressure distribution. OCC was directed to the address to close waivers so this waiver can be formally closed.

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| <b>16</b> | Were pipeline program files well-organized and accessible?<br>Info Only = No Points | Info Only | Info Only |
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Evaluator Notes:

Oklahoma had electronic files and color coded hard copy files as backup. All documentation was readily retrievable during the inspection.

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| <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?<br>Yes = 3 No = 0 Needs Improvement = 1-2 | 3 | 3 |
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Evaluator Notes:

2022 SICT days for gas are 1259. There were 1603 inspection days in 2022. 353 days were construction days. The 20 % construction day requirement was met. SICT Peer review comments identified the need to list the number of customers for Oklahoma Natural Gas. This was done.

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| <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><br>Info Only = No Points | Info Only | Info Only |
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Evaluator Notes:

OCC metrics were reviewed with OCC staff.

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| <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.<br>Info Only = No Points<br>a. <a href="https://pipelinesms.org/">https://pipelinesms.org/</a><br>b. Reference AGA recommendation to members May 20, 2019 | Info Only | Info Only |
|-----------|--|-----------|-----------|

Evaluator Notes:

The Commission supports SMS is discussions in with operator. SMS is also addressed during meetings with operators. An Advisory letter on SMS went out on 11/20/2020. confirm. This was Tracked in the advisory bulletin spreadsheet.

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| <b>20</b> | General Comments:<br>Info Only = No Points | Info Only | Info Only |
|-----------|--|-----------|-----------|

Evaluator Notes:

There were no issues with Part D.

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:

Oklahoma Natural Gas Standard Inspection was evaluated for Guthrie unit on 6/27/23.

- The inspection evaluated was a standard inspection of Oklahoma Natural Gas Guthrie unit.
- Pipeline Operator compliance personnel were at the inspection.
- Inspectors were Dustin Merriman, Chad Holliday and Larry Sacket.

- 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:

The inspectors use IA equivalency forms. The form is filled out electronically on an IPAD,

- 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:

a-e Observed was records review and procedures review for the unit. Field work was also observed. Leak Management records was reviewed, casing isolation, pipe to soil readings, regulator and relief testing, exposed pipes and the low-pressure system was also reviewed. The inspection was an adequate length.

- 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:

Inspectors were knowledgeable of pipeline safety regulation and pipeline operations. Inspectors asked appropriate questions.

- 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:

Exit interview was to be conducted at the end of the inspection.

- 6 Was inspection performed in a safe, positive, and constructive manner ? Info Only Info Only  
Info Only = No Points
- 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:

Inspections were performed in a safe manner. Appropriate PPE was worn. The inspection was conducted in a safe manner. Inspectors Performed a protocol 9 evaluation of rectifier testing. Pressure regulation equipment was tested. Pipe to soil reading were made. Isolation of casing s was also checked.

7 General Comments:  
Info Only = No Points

Info Only Info Only

Evaluator Notes:

No issues with Part E.

Total points scored for this section: 15  
Total possible points for this section: 15



- |   |  |   |   |
|---|--|---|---|
| 1 | 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:

Annual reports are reviewed by Randy, Kelly and Dennis. Spreadsheets are used to track information for accuracy and trending. Information from this review is used to populate the Commission risk assessment. Semiannual reports also submitted. Annual report information is also entered on a spreadsheet. This information is reviewed by the associated inspector.

- |   |  |   |   |
|---|--|---|---|
| 2 | 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:

Operators are required to submit a semi annual report which includes damage prevention information. This is required in Oklahoma regulation. This is a new process and is evolving. OCC intends to hire 1 people (3 hired) to work on damage prevention issues. Their main purpose will be to investigate line hits. Information is tabulated by Randy for review. Randy Snyder was promoted to regulatory program manager to manage damage prevention activity. OCC investigated approximately 11 third party hits in 2022. This generated violation letters which identified poor operator practices to prevent reoccurrence. Semiannual reports were used to identify high damage prevention incident operators. 7 letters went to operators, 4 letters went to excavators.

- |   |   |   |   |
|---|---|---|---|
| 3 | 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:

Reports are received semi annually. Information is consistent with annual reporting requirements. Causal factors are reviewed by Commission personnel to determine causal factors.

a. Root cause numbers are evaluated on spreadsheet.

b.-c Appendix D matrix was presented and discussed with Commission staff.

d.-j The State did damage prevention investigations for third party damage events. As a result of the investigations the state addressed violations based on their investigation results. Most investigations generated violations.

- |   |  |   |   |
|---|--|---|---|
| 4 | 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 | 2 | 2 |
|---|--|---|---|
- a. What stakeholder group is causing the highest number of damages to the pipelines? Operator, contractor, locating company or public.
  - b. Has the state verified the operator is appropriately focusing damage prevention education and training to stakeholders causing the most damages?
  - 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:

Randy calculated hits per 1000 information from annual report data. Randy tabulates causal information.

- a. Operator/ excavator are the two largest stakeholder groups responsible for reporting. Excavators are highest cause of damage.
- b. Operators participate in the one call expo and home and garden show, Randy and Billy have done presentations at these venues.
- c. The State did approximately 11 damage prevention investigations resulting in 11 violation letters. There were 7 operator violations and 4 excavator violations.
- d. Operators are regulated to comply with the public awareness programs. These programs are evaluated by state.

- 
- |   |  |           |           |
|---|--|-----------|-----------|
| 5 | General Comments:<br>Info Only = No Points | Info Only | Info Only |
|---|--|-----------|-----------|

Evaluator Notes:

There were no issues with Part F

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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:

OK 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:

OK 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:

OK 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:

OK 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:

OK 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:

OK 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