



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

1200 New Jersey Avenue SE  
Washington DC 20590

# 2022 Hazardous Liquid 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 Hazardous Liquid State Program Evaluation -- CY 2022  
Hazardous Liquid

**State Agency:** Oklahoma

**Agency Status:**

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

**Agency Representative:** Joe Subsits

**PHMSA Representative:** Dennis Fothergill, Kelly Phelps, Randy Snyder, Billy Anglin

**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, OK 73105

**Rating:**

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

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**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.

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**Scoring Summary**

<b>PARTS</b>		<b>Possible Points</b>	<b>Points Scored</b>
A	Progress Report and Program Documentation Review	0	0
B	Program Inspection Procedures	15	15
C	State Qualifications	10	10
D	Program Performance	50	50
E	Field Inspections	15	15
F	Damage prevention and Annual report analysis	6	6
G	Interstate Agent/Agreement States	0	0
<b>TOTALS</b>		<b>96</b>	<b>96</b>
<b>State Rating .....</b>			<b>100.0</b>

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## 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:

OCC score 50 of 50 points on their progress report

- a. Progress report numbers match numbers from PIPES data base. There is 1 refined product line, 18 crude systems down from 21, 9 HVL systems and 1 CO2 system.
- b. Progress reports matched PIPES liquid inspection day count of 324 inspection days. 261 days were required for 2022.
- c. Attachment 1 numbers matched attachment 3.
- d. The progress report incident reports matched Pipeline Safety Data Mart. 30 day reports were submitted for each incident.
- e. Compliance data carried over from last year. Compliance data on the progress report adds up properly including the correct amount of carry over compliance actions from 2021.
- f. Records were readily retrievable from the PIPES data base. The state also has hard copies of records.
- g. Inspection qualifications were checked and compared to blackboard. Gas, Liquid and underground storage time added up to 100% for each person.
- h. Federal regulations are adopted within 2 years of the rule effective date.
- i. Larry Sackett is new liquids person. The Commission continues to convert paper documentation to electronic files.

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. IMP Inspections</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> </ul> |   |   |

## Evaluator Notes:

Pre-inspection, inspection and post inspection procedures are addressed on page 6.

- a. Standard inspections are addressed on page 4. Drug/Alcohol, public Awareness and CRM inspections are addressed on page 4 and 5.
- b. IMP inspections are addressed on page 5. Page 10 requires annual review of integrity management implementation results of the largest liquid operators.
- c. OQ inspections are covered on pages 8-9.
- d. Damage prevention inspections are addressed on page 5 of the procedure.
- e. On-site training is covered on page 15.
- f. Construction inspections are scheduled on page 4.

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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   | 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:

Risk priorities are mentioned on page 7 - 11 of the procedures. OCC requires large operators 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. The inspection form to be used is mentioned in the General Provisions section on page 14. a-e Prioritization considerations are addressed on page 12. f. Inspection units are broken down appropriately.

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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 |
|   | <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:

Compliance procedures are on page 13-14. Contempt hearings are mentioned on page 4. The hearing will be used to address non compliance. Civil penalties are addressed on page 15.

- a. Finalization of inspection results is required within 90 days as addressed on page 12. Requirements to conduct exit interview is on page 6. Page 13 states inspector will report findings at the exit interview.
- b. Annual review of long-term compliance issues is addressed on page 14. Compliance date is established in letter. Janice

has a tickler. Brook does weekly spread sheet describing open reports.  
c. Conditions for close out are addressed on page 14-15.

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|----------|--|---|---|
| <b>4</b> | (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 |
|          | 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:

Accident incident investigations are addressed on page 12, 17 and 18.

a. Taking incident calls is addressed on page 11.

b. Telephonic investigation required if no inspector is on-site. This is on page 11.

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

Evaluator Notes:

There were 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 IMP Training before conducting inspection as lead</li><li>c. Root Cause Training by at least one inspector/program manager</li><li>d. Note any outside training completed</li><li>e. 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:

Core liquid qualified inspectors are David Campbell, Vince Eitzen, Rick Mathews, Kelly Phelps and Randy Snyder.

- a. Inspectors qualified to conduct OQ inspections are Bruce Cambell, Vince Eitzen, John Harper, Chad Holiday, Randy Kirkegard, Rick Mathews, Dustin Merriman, Jeff Overbay, Kelly Phelps, Chance Nestell, Mitchel Skinner, Randy Snyder, Don Taxton and Billy Anglin
- b. Inspector that are Liquid IMP qualified are Bruce Cambell, Vince Eitzen, John Harper, Rick Mathews, Kelly Phelps and Randy Snyder.
- c 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, Kelly Phelps, Mitchel Skinner, Randy Snyder, Don Taxton and Billy Anglin.
- d. Hazwopper refresher was done.
- e. All liquid inspections are conducted by Vince Eitzen or Larry Sackett(Larry is still taken T&Q classes)

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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 |
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### Evaluator Notes:

There are no issues with Part C.

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



## PART D - Program Performance

Points(MAX) Score

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|---|--|---|---|
| 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. Construction (did state achieve 20% of total inspection person-days?)</li><li>f. OQ (see Question 3 for additional requirements)</li><li>g. IMP (see Question 4 for additional requirements)</li></ul> |   |   |

### Evaluator Notes:

- All types of required inspections were performed within the 5-year expectation.
- a. Standard inspections were conducted within the five-year interval.
  - b. Public awareness inspections were conducted within the five-year interval.
  - c. Drug and alcohol inspections were conducted within the five-year interval.
  - d. Control Room Management inspections were conducted within the five-year interval.
  - e. There were four hazardous liquid construction days in 2022.
  - f. Operator qualification inspections were conducted within the five-year interval.
  - g. Integrity Management inspections were conducted within the five-year interval.

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|---|---|----|----|
| 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. Construction</li><li>f. OQ (see Question 3 for additional requirements)</li><li>g. IMP (see Question 4 for additional requirements)</li></ul>   |    |    |

### Evaluator Notes:

- OCC uses IA for programmatic inspections and IA equivalent for standard inspections.
- a. Standard inspections forms were filled out completely and appropriately.
  - b. Public Awareness Effectiveness inspection inspections forms were filled out completely and appropriately.
  - c. Drug and Alcohol inspections forms were filled out completely and appropriately.
  - d. Control Room inspections forms were filled out completely and appropriately.
  - e. OCC uses either an IA equivalent or State form for construction activities.
  - f. Operator Qualification inspections forms were filled out completely and appropriately.
  - g. Integrity Management inspections forms were filled out completely and appropriately.

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|---|--|---|---|
| 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 Part 195 Subpart G<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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### Evaluator Notes:

- The State performs Programmatic Operator Qualification inspections on a regular basis. Protocol 9 inspections are performed during each standard inspection.

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| 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 Part 195 Subpart F & G<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|   | 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?   |   |   |

Evaluator Notes:

John tracks annual IMP review of the largest operators. These reviews were completed annually. Large operators' have more than 50 HCA miles.

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| 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 records of previous accidents and failures including reported third-party damage and leak response to ensure appropriate operator response as required by 195.402; and   |   |   |
|   | b. 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;                        |   |   |

Evaluator Notes:

- a. Review of the operator response to incidents is performed during the incident investigation.
- b. The directional boring procedure question is an addendum question on the state specific checklist.

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| 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:

John Harper uses advisory bulletin spreadsheets to track advisory bulletin notification.

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|---|---|----|----|
| 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?  |    |    |
|   | 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. There were two liquid compliance actions in 2022. The violations were documented appropriately.
- c. Violations were properly resolved.
- d. Violations are tracked in the PIPES system which allows open violations to tracked.
- e. All violations identified were properly processed. There was 0 carry over into 2023.



- f. The OCC proposed penalties on the gas program last year.
- g. Dennis reviews, approves and monitors compliance actions.
- h. Opportunities for due process are documented in compliance letters.
- i. Exit interviews were within 30 days.
- j. Written notice is received within 90 days.

**8** (Accident 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 8 federally liquid reportable incident in OK. On 6/24/22 and 4/22/2022 Sonoco had two 15 bbl internal corrosion leak. On 4/8/2022 and 2/20/2022 Enable had two internal corrosion leaks. On 5/9/2022 Great Salt Plains had an overfill event. Keara had a 12/20/2022 tank mixer seal leak. Sunoco had a gasket leak on 10/20/2022. The great Salt Plains had a 9/21/2022 leak due to a downed power line.

- a. Oklahoma assigns an inspector to serve 24 hour on-call duty to receive pipeline incident notifications.
- b. Adequate records of incident notifications were made.
- c. On-site investigations were made for all Federally reportable incidents.
- d-f. Observations, contributing factors and recommendations were documented.
- g. There was one compliance item that was issue to Kiera for not having thermal reliefs.
- h. AID sends reports to OCC for processing.
- i. Lessons are shared at the NAPS Regional meeting. Lessons learned are also presented at the Damage Prevention Expo, Oklahoma Gas Association meeting and Small Operator training.

**9** 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 1 1

Yes = 1 No = 0 Needs Improvement = .5

**Evaluator Notes:**

10/2/2021 letter was sent to Chair Dana Murphy. The letter did not require a response as there were no issues. Todd Hiatt is new chair commissioner.

**10** Did State conduct or participate in pipeline safety training session or seminar in Past 3 Years? Chapter 8.5 Info Only Info Only

Info Only = No Points

**Evaluator Notes:**

The last seminar was in 2019. A 2021 seminar was cancelled due to COVID travel restrictions. A seminar was rescheduled for November 2022.

**11** Has state confirmed transmission operators have submitted information into NPMS database along with changes made after original submission? Info Only Info Only

Info Only = No Points

**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:

Enable gas found 42 internal corrosion anomalies. An Inspection report will be done when situation is resolved. The issue is currently under investigation.

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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 NAPSRS or PHMSA; and<br>b. PHMSA Work Management system tasks? | 1 | 1 |
|-----------|---|---|---|

Evaluator Notes:

- a. The Commission responds to NAPSRS surveys. Typically, Dennis seeks input from field personnel prior to filling out the survey monkey.
  - b. Supervisors work on WMS issues periodically checks IMP notifications. 6 2022 WMS activities are open. 5 activities were failure investigations and 1 SRC was open.
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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 |
|-----------|--|---|---|

Evaluator Notes:

There were no liquids waivers.

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

Evaluator Notes:

Oklahoma had electronic files and color-coded hard copy files as backup. No issues found

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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:

There were 261 2022 Liquid SICT days. There were no peer comments on the liquids side. OCC had 324 liquid days.

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

Evaluator Notes:

Metrics were discussed with OCC supervisors.

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

Evaluator Notes:

The commission supports SMS in discussion and meetings with operators. A letter supporting SMS went out in 11/20/20.

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- 20** General Comments: Info Only Info Only  
Info Only = No Points

Evaluator Notes:

There were no issues with Part D.

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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:

Observed field and records review for inspection of Daylight Petroleum Co. on 6/28/23.

- This was a standard inspection in Linsay OK.
- This operator was last inspected on 2020.
- The operator had several representatives available during the inspection.
- Vince Eizen performs all liquid inspections. He has 19 years of experience. He was training Larry Sackett who has less than one year of experience.

- 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:

OCC inspectors used the Inspection Assistant equivalent form which is used electronically.

- 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:

Procedures And records were reviewed during the records portion of the inspection. The right of way was inspected. 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:

Vince had adequate knowledge of pipeline operation and regulation. He asked good questions and looked at the appropriate portions of the pipeline facility.

- 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:

An exit interview is 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

- 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:

- a. The inspection was conducted in a safe manner. Proper PPE was worn.
- b. The inspector did a protocol 9 inspection of valve inspections and locating. The portions of the facility that were inspected were the right of way, pipe to soil readings, rectifiers, valve inspection and operation, signs, markers, component ratings, atmospheric corrosion, Launcher / receivers and line pressure.
- c.-d N/A

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7 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

There were no issues with part E.

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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**

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|---|--|---|---|
| 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 are used to populate the Commission risk assessment. Semiannual reports also submitted. Annual report information is transferred to a spreadsheet. This information is reviewed by 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 person (3 were hired) to work on damage prevention issues. Their main purpose will be to investigate line hits. tabulates information for Randy to review. Randy Snyder was promoted as regulatory program manager. OCC investigated approximately 11 third party hits in 2022. This generated violation letters which identified poor operator practices to prevent reoccurrence. Semi annual 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>Info Only = No Points<br>a. Is the information complete and accurate with root cause numbers?<br>b. Has the state evaluated the causes for the damages listed under "One-Call Notification Practices Not Sufficient" (Part D.1.a)?<br>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?<br>d. Is the operator or its locating contractor(s) qualified and following written procedures for locating and marking facilities?<br>e. Is the operator appropriately requalifying locators to address performance deficiencies?<br>f. What is the number of damages resulting from mismarks?<br>g. What is the number of damages resulting from not locating within time requirements (no-shows)?<br>h. Is the operator appropriately addressing discovered mapping errors resulting in excavation damages?<br>i. Are mapping corrections timely and according to written procedures?<br>j. Has the state evaluated the causes for the damages listed under "Excavation Practices Not Sufficient" (Part D.1.c)? | Info Only | Info Only |
|---|--|-----------|-----------|

**Evaluator Notes:**

Reports are received semiannually. 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 The Appendix D matrix was presented and discussed with Commission staff.  
d-j The State performed 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<br>a. What stakeholder group is causing the highest number of damages to the pipelines? Operator, contractor, locating company or public. | 2 | 2 |
|---|--|---|---|

- 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 has done presentations at these venues.
- c. The State performed 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.

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**5** General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

There were no issues with part F

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Total points scored for this section: 6  
Total possible points for this section: 6



## 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