



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

S. D. PUBLIC UTILITIES 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: South Dakota

Agency Status:

Date of Visit: 04/24/2023 - 04/28/2023

Agency Representative: Mary Zanter, Pipeline Safety Program Manager

PHMSA Representative: Agustin Lopez, State Liaison

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

Name/Title: Kristie Fiegen, Chairperson

Agency: South Dakota Public Utilities Commission

Address: 500 E. Capitol Ave.

City/State/Zip: Pierre, SD 57501

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. Verified operator data with PDM. Two new pipeline operators added in 2022.
- b. Verified inspection activity by reviewing inspection reports and SDPUC spreadsheets which track activities.
- c. Verified operator data with PDM and SD PUC data.
- d. There were no reportable intrastate incidents in 2022. There is one incident in PDM which occurred in 2021 which was investigated last year.
- e. Reviewed compliance actions issued by the SDPUC.
- f. Records are kept electronically by the SDPUC.
- g. Verified training with TQ Blackboard.
- h. SDPUC has adopted all amendments within the required 2 years.
- i. SDPUC has past and planned performance and answered damage prevention questions.

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



PART B - Program Inspection Procedures

Points(MAX) Score

- | | | | |
|---|---|---|---|
| 1 | Do written procedures address pre-inspection, inspection and post inspection activities for each of the following inspection types: Chapter 5.1
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
| | <ul style="list-style-type: none">a. Standard Inspections, which include Drug/Alcohol, CRM and Public Awareness Effectiveness Inspectionsb. TIMP and DIMP Inspections (reviewing largest operator(s) plans annually)c. OQ Inspectionsd. Damage Prevention Inspectionse. On-Site Operator Trainingf. Construction Inspections (annual efforts)g. LNG Inspections | | |

Evaluator Notes:

Section 5 of the South Dakota Pipeline Safety Program manual includes procedures for each type of inspection type. Procedures describes each type of inspection to give guidance to inspectors. Section 4 includes Part B Pre-Inspection and Part D post inspection procedure outline activities conducted by the inspectors before an after each inspection.

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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
Yes = 4 No = 0 Needs Improvement = 1-3 | 4 | 4 |
| | <ul style="list-style-type: none">a. Length of time since last inspectionb. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities)c. Type of activity being undertaken by operators (i.e. construction)d. Locations of operator's inspection units being inspected - (HCA's, Geographic area, Population Centers, etc.)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)f. Are inspection units broken down appropriately? | | |

Evaluator Notes:

Section 6 of the South Dakota Pipeline Safety Program manual includes metric risk factors to prioritize inspections. Risks include pre code pipe, corrosion leaks, number of services, HCA miles, excavation leaks, cast/bare pipe. All inspection types will be conducted at intervals not to exceed 5 years.

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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
Yes = 3 No = 0 Needs Improvement = 1-2 | 3 | 3 |
| | <ul style="list-style-type: none">a. Procedures to notify an operator (company officer) when a noncompliance is identifiedb. Procedures to routinely review progress of compliance actions to prevent delays or breakdownsc. Procedures regarding closing outstanding probable violations | | |

Evaluator Notes:

Section 4 of the South Dakota Pipeline Safety Program manual includes compliance procedures. Number 7 includes noncompliance resolution procedures which has steps to issue and track noncompliance actions. Procedures include to notify an operator company official as required in ARSD 20:10:37:07, (South Dakota Administrative Rules). Part E describes each type of violation and compliance action associated with the violations.

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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?
Yes = 3 No = 0 Needs Improvement = 1-2 | 3 | 3 |
| | <ul style="list-style-type: none">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:

Section 7 of the South Dakota Pipeline Safety Program manual include incident investigation procedures. The procedure has a mechanism to receive notifications 24 hours a day. If onsite investigation is not conducted reasoning will be documented. Investigations include observations, contributing factors and recommendations to prevent recurrences. Part B describes the mechanism used for receiving incident notifications.

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

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

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



PART C - State Qualifications

Points(MAX) Score

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|---|---|---|---|
| 1 | Has each inspector and program manager fulfilled training requirements? (See Guidelines Appendix C for requirements) Chapter 4.3
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
| | <ul style="list-style-type: none">a. Completion of Required OQ Training before conducting inspection as leadb. Completion of Required DIMP/IMP Training before conducting inspection as leadc. Completion of Required LNG Training before conducting inspection as leadd. Root Cause Training by at least one inspector/program managere. Note any outside training completedf. Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector (Reference State Guidelines Section 4.3.1) | | |

Evaluator Notes:

Yes, verified training in TQ Blackboard and SD PUC records. Mary Zanter and Boice Hillmer are qualified to conduct all types of inspections and have both taken the Root Cause Training.

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

Yes, Mary Zanter is very knowledgeable of the pipeline safety program and regulations

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| 3 | General Comments:
Info Only = No Points | Info Only | Info Only |
|---|--|-----------|-----------|

Evaluator Notes:

The SD PUC is mainly complying with Part C of the Evaluation.

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



PART D - Program Performance

Points(MAX) Score

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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
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
| | <ul style="list-style-type: none">a. Standard (General Code Compliance)b. Public Awareness Effectiveness Reviewsc. Drug and Alcohold. Control Room Managemente. Part 193 LNG Inspectionsf. Construction (did state achieve 20% of total inspection person-days?)g. OQ (see Question 3 for additional requirements)h. IMP/DIMP (see Question 4 for additional requirements) | | |

Evaluator Notes:

Reviewed SD PUC data and the inspection cycles are being met in accordance with their procedures. Have atleast 20% of construction time.

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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?
Yes = 10 No = 0 Needs Improvement = 1-9 | 10 | 10 |
| | <ul style="list-style-type: none">a. Standard (General Code Compliance)b. Public Awareness Effectiveness Reviewsc. Drug and Alcohold. Control Room Managemente. Part 193 LNG Inspectionsf. Constructiong. OQ (see Question 3 for additional requirements)h. IMP/DIMP (see Question 4 for additional requirements) | | |

Evaluator Notes:

Reviewed inspection reports to assure completeness and verify all code requirements are being addressed.

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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 192 Part N
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

Conduct OQ Plan inspections of operators to assure OQ Programs are in compliance. Protocol 9 are conducted to verify operator qualifications.

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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 192 Subparts O and P
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
| | <ul style="list-style-type: none">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?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?c. Are the states verifying operators are including low pressure distribution systems in their threat analysis? | | |

Evaluator Notes:

Yes, reviewed randomly selected IMP and DIMP inspection reports to verify plans are being reviewed for compliance. Have IMP question in the inspection forms to discuss IMP program and any changes or updates.

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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
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
| | a. Operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken;
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);
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;
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;
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;
f. Operator procedures for considering low pressure distribution systems in threat analysis?
g. Operator compliance with state and federal regulations for regulators located inside buildings? | | |

Evaluator Notes:

- a. South Dakota no longer has any cast iron.
- b. South Dakota no longer has any cast iron
- c. There is a question on the O&M inspection form that discusses this topic. All operators address this in their O&M Manual. Question #192.615(a)(3)
- d. There is a question on the even year records inspection form that discusses this topic. The information was covered in 2022 and is being covered again in 2024.
- e. There is a question on the O&M inspection form that discusses this topic. All operators address this in their O&M manual. The question is in the damage prevention section.
- f. The last low pressure system was removed in 2019 in Rapid City by MDU.
- g. The code sections associated with inside meters are included in the O&M Manual inspection form. Code references include 192.353, 192.355, 192.357, 192.481, and 192.723. Also, during field inspections these code sections are also checked during meter set inspections.

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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)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

All advisory bulletins, NPRMs, and rule changes are communicated to the operators via email.

Most advisory bulletin information has been incorporated into the inspections.

In February and again in March 2023, after 2 incidents in South Dakota regarding snow load on meter sets a reminder of the advisory bulletin was sent out to operators to ensure that proper steps were being taken to ensure that the meter sets and other above ground structures were being reviewed and customers were being advised to clear their meter sets.

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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
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:

Reviewed randomly selected inspection reports with compliance actions to assure procedures are being followed. Compliance actions are being issued whenever probable violations are discovered during inspections. Post inspection exit interview is conducted to discuss findings and compliance letters are sent within 30 days.

8	(Incident Investigations) Were all federally reportable incidents investigated, thoroughly documented, with conclusions and recommendations?	10	10
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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 no intrastate reportable incidents in 2022. One incident report was in PDM that occurred in 2021 but the 30 day report was submitted in 2022. This incident was investigated in 2021 by the SD PUC.

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
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Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

A response was not necessary for previous evaluation.

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

Evaluator Notes:

A joint ND/SD pipeline seminar was held in virtually by South Dakota in October 2020. <https://puc.sd.gov/psot/2020/agenda.aspx>

North Dakota is currently planning ND/SD pipeline seminar to be held in ND in the fall of 2023. South Dakota is monitoring the situation to ensure that a seminar is held in 2023

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

Question is included in records inspection form. Records Inspection Form, Section II, page 4

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| 12 | Does the state have a mechanism for communicating with stakeholders - other than state pipeline safety seminar? (This should include making enforcement cases available to public).
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

There is a group email set up that includes all of the operators. Anyone who wishes to be included in the group is included. Information shared includes advisory bulletins, NPRMs, Rule makings, FAQs, manufacture recalls, interpretation letters, etc.

A commission docket is created for all compliance actions that involve a penalty and commission action.

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

There were no SRCR reported in 2022 on intrastate operators. The SD PUC does have procedures when SRCR are received.

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| 14 | Was the State responsive to:
Yes = 1 No = 0 Needs Improvement = .5
a. Surveys or information requests from NAPSRS or PHMSA; and
b. PHMSA Work Management system tasks? | 1 | 1 |
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Evaluator Notes:

Mary regularly responds to NAPSRS and PHMSA survey's and requests for information. (Robert does track this information.)

No IM notification have occurred.

All work management tasks that have occurred have been acted on. Only new OPIDs have occurred.

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| 15 | If the State has issued any waivers/special permits for any operator, has the state verified conditions of those waivers/special permits are being met? This should include having the operator amend procedures where appropriate.
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

Certain waivers on the PHMSA site are closed and should be removed. Will work with PHMSA to have them removed. Open waivers should be: two dealing with 481. atmospheric corrosion monitoring, two dealing with 625(a) odorization but it should only be one waiver, the other is a duplicate.

The 2001 waiver to MDU dealing with UPONOR pipe will need to get further information to see if it should be closed.

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

Yes, documents were provided electronically with no issues.

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| 17 | Discussion with State on accuracy of inspection day information submitted into State Inspection Day Calculation Tool (SICT). Has the state updated SICT data?
Yes = 3 No = 0 Needs Improvement = 1-2 | 3 | 3 |
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Evaluator Notes:

SCIT information was developed using inspection history. The numbers are reviewed each year to ensure significant changes have not occurred and add additional operators

- 18** Discussion on State Program Performance Metrics found on Stakeholder Communication Info Only Info Only
site.\ <http://primis.phmsa.dot.gov/comm/states.htm?nocache=4805>
Info Only = No Points

Evaluator Notes:

Damages per 1000 locates is above the national average 4.6 vs 2.5. Accelerated actions have been tried. Received grant to provide more education and 811 advertisement. SD PUC does not have enforcement so this may attribute to excavator damage being high. Working with PHMSA and operators to find ways to lower damages in the state.

- 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:

At the ND/SD pipeline safety seminars in 2020, 2019 & 2017 there was a speaker that discussed PSMS. Other information has also been provided in emails to all operators.

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

Evaluator Notes:

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

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



- 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:

1. Crooks Municipal Gas

Location: Crooks, SD

Date of inspection: April 25, 2023

Agustin Lopez, Evaluator

- Evaluated Ms. Mary Zanter perform a records inspection and field inspection.
- June 2021
- Operator personnel were present
- Alternate inspectors evaluated each year.

2. MidAmerican Energy

Location: Sioux Falls, ND

Date: April 26, 2023

Agustin Lopez, Evaluator

- Ms. Mary Zanter was evaluated while conducting construction inspection of MidAmerican Energy.
- Construction inspections are conducting on MidAmerican every year.
- Yes, operator representative was present during the inspection.
- Rotate inspectors that are evaluated every year.

- 2 Did the inspector use an appropriate inspection form/checklist and was the form/checklist used as a guide for the inspection? (New regulations shall be incorporated) 2 2

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

- Yes, form used was "Pipeline Safety Records Inspection Checklist" as a guide and to document inspection results.
- Yes, construction inspection form was utilized by the inspector to document the inspection.

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

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

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

Evaluator Notes:

- Reviewed records and a field inspection was conducted during the inspection. Records were reviewed in detail to assure compliance. During field inspection inspector witnessed valve operation, signs of corrosion, markers, barriers and ROW conditions.
- During construction inspection, inspector witnessed fusion activities, backfill and boring. Records were requested for qualification of personnel.

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| 4 | From your observation did the inspector have adequate knowledge of the pipeline safety program and regulations? (Evaluator will document reasons if unacceptable)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

Yes, Mary Zanter is very knowledgeable of the pipeline safety rules and regulations.

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| 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)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

1. Yes, an exit interview was conducted with the operator at end of the inspection to discuss issues. Discussed wrapping of pipe soil to air interface and the need to locate two valves not found during inspection.

 2. Yes, an exit interview was conducted at the end of the construction inspection to discuss issues. There were no compliance issues found during the inspection.
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| 6 | Was inspection performed in a safe, positive, and constructive manner ?
Info Only = No Points | Info Only | Info Only |
|---|--|-----------|-----------|
- a. No unsafe acts should be performed during inspection by the state inspector
 - b. What did the inspector observe in the field? (Narrative description of field observations and how inspector performed)
 - c. Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices)
 - d. Other

Evaluator Notes:

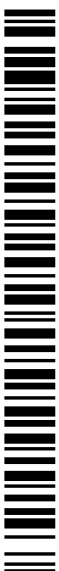
Yes, the inspection were performed in a safe, positive and constructive manner.

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| 7 | General Comments:
Info Only = No Points | Info Only | Info Only |
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Evaluator Notes:

Ms. Mary Zanter is very knowledgeable of the pipeline safety regulations. She performed excellent inspections and conducted herself very professionally. She is a great asset to the SD PUC.

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

Conduct annual report reviews and analyze for negative trends. Reviewed spreadsheet with annual report data.

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

Mary has quarterly meetings with the larger operators who have the majority of damages. These meeting provide an opportunity to share strategies and information and provides Mary an opportunity to emphasize certain concerns and recent studies. These meetings were conducted in 2022 and continue today.

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

Yes, Annual Report Part D is part of the annual reviews conducted by the SD PUC.

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|---|---|---|---|
| 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?
Yes = 2 No = 0 Needs Improvement = 1 <ol style="list-style-type: none">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? | 2 | 2 |
|---|---|---|---|

Evaluator Notes:

Reports are reviewed in detail for damage prevention information Damages per 1000 locates updated 3-2022 This report has detailed information for each year in tabs. In 2022 the details regarding damages was reviewed for each damage with special emphasis on "locating practices not sufficient" and "other". See 2022Excavation Damage Detail (verion1).xlsx

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

The SDPUC is mainly complying with Part F of the evaluation. Only concern is the high ratio of damages per 1,000 locate tickets. The ratio is 4.6 compared to the national average of 2.5 which is a concern. The SD PUC is working with PHMSA and operators to find ways and accelerated actions to reduce the number of damages.

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:

SD PUC 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:

SD PUC 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:

SD PUC 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:

SD PUC 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:

SD PUC 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:

SD PUC 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