



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

RAILROAD COMMISSION OF TEXAS

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: Texas

Agency Status:

Date of Visit: 08/14/2023 - 08/25/2023

Agency Representative: Stephanie Weidman, PHMSA Program Manager - Pipeline Safety
Carrie Ebbinghaus

PHMSA Representative: Michael Thompson, State Liaison
David Lykken, State Liaison

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

Name/Title: Christi Craddick, Chairman

Agency: Rail Road Commission of Texas

Address: 1701 N. Congress

City/State/Zip: Austin, TX 78701

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
44
15
10
0

TOTALS

100 94

State Rating

94.0

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. Information is pulled from the PIPES data base
- B. Numbers are pulled from weekly submitted time reports from inspectors.
- C. The number of operators on attachment 3 don't match those on attachment 1. The state will be providing notes in future progress reports to help explain the differences.
- D. Verified reportable incidents in PDM with Attachment 4. There were no issues identified.
- E. Verified compliance actions submitted on Attachment 5.
- F. TX RRC keeps all records electronically in their PIPES database.
- G. Reviewed qualifications and verified with Blackboard and the RRC training records. No issues identified.
- H. TX RRC has adopted all the regulations within the 2 year requirement.
- I. TX RRC listed their planned and past performance activities and damage prevention initiatives

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:

Yes, Section 3 addresses pre and post inspection activities for each type of inspection.

A. Yes, Section 3 has comprehensive inspection procedures which give guidance to inspectors on conducting comprehensive procedures.

B. Yes Section 7.1 and 7.2 has IMP and DIMP inspection procedures which give guidance to inspectors on how to conduct inspections. The procedures include pre and post inspection activities.

C. Yes Section 7.3 has OQ inspection procedures which give guidance to inspectors on how to conduct inspections. The procedures include pre and post inspection activities.

D. Yes Section 7.7 has Damage Prevention inspection procedures which give guidance to inspectors on how to conduct inspections. The procedures include pre and post inspection activities.

E. Section 6 has On-Site Training procedures which includes documentation of training on PES.

F. Section 7.6 which gives guidance to inspectors on how to conduct construction inspections.

G. Section 3.3.11 mentions LNG facility inspections.

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

Yes, Section 3 has a risk based inspection priority. PES generates an inspection schedule each calendar year based on risk factors for each system. The risk factors include; previous violations, customer count, leaks, type of pipe, inspection frequency, incidents, HCAs, class location and non evaluated systems. Inspection units are broken down into systems which vary in size.

- | | | | |
|---|---|---|---|
| 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 3.6 and Section 5 have procedures to notify operator of alleged violations. In 3.2.2 it states that contact must be an

officer of the company. In 3.4 it states the RRC sends a executive closing summary to the operator when they close out an inspection. Section 5 is for follow ups.

- 4 (Incident/Accident Investigations) Does the state have written procedures to address state actions in the event of an incident/accident? 3 3

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:

- A. Section 8.2.1 and 8.2.2 has On-Call procedures that include after hours response. RRC inspectors rotate on call duties. During operating hours, the RRC Accident Coordinator receives calls and routes them to the on-call inspector.
 - B. Section 8.2.3 shows the requirements for an on-site investigation. The procedure states that all incidents that meet their requirements must have an on-site investigation on both regulated intrastate and non-regulated intrastate pipelines.
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- 5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

NONE

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



PART C - State Qualifications

Points(MAX) Score

- | | | | |
|---|---|---|---|
| 1 | Has each inspector and program manager fulfilled training requirements? (See Guidelines Appendix C for requirements) Chapter 4.3
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:

- A. Yes lead inspectors are qualified to conduct inspections. The Program Manager has procedure to allow inspectors be qualified to conduct comprehensive inspections without completing the required T&Q courses.
- B. Yes, verified all lead inspectors are qualified to lead IMP inspections.
- C. Yes, there are RRC inspectors who have completed the Root Cause training course.
- D. RRC inspectors attend outside training.
- E. Verified during records review that all inspectors are qualified before leading any type of inspection.

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

Evaluator Notes:

Yes, the Program Manager has been with the RRC for awhile and has completed T&Q courses. She demonstrates knowledge of the PHMSA program and regulations.

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

Evaluator Notes:

NONE

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



PART D - Program Performance

Points(MAX) Score

- | | | | |
|---|---|---|---|
| 1 | Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 0 |
| | <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:

DISTRIBUTION:

1. Cotulla Municipal/ OQ Last done 5/2022, D&A last done 4/2019 - NO Priors found
2. City of Dumas/ OQ last done 8/2020 prior 7/2005
3. City of Brady/ OQ last done 10/2019 NO Prior
4. City of Hemphill/ D&A last done 2/2017 No prior
5. Metropolitan LP Gas/ DIMP last done 4/2018 No prior. OQ last done 1/2021 No Prior. PAPI last done 1/2020 NO prior. D&A None
6. City of McClean/ DIMP Last done 4/2018 No Prior. OQ Last done 6/2021 No Prior. PAPI Last done 1/2023 No Prior. D&A Last done 7/2021 No Prior

TRANSMISSION:

1. Market West PNG/ (There was Critical Infrastructure information mixed in with the pipeline safety information making this hard to be clarified. TIMP last done 8/2021, OQ 11/2022, NO Priors.
 2. Buckeye Partners/ TIMP Last done 7/2023, OQ Last done 4/2023 - NO Priors.
 3. Blue Cure Operations/ Standard Comp Last done 2/2019, TIMP 7/2019, D&A 5/2018, PAPI 4/2018 - NO Priors
 5. Williams ALP Operating/ Standard Comp 10/2019, TIMP 5/2018, OQ 4/2019, D&A 3/2019 - NO Priors
- Five-points deducted for not meeting established time intervals.

****This portion of the evaluation was hampered by the RRC Texas using the same data base, (PIPES) to store the information and records for their new division, "Critical Infrastructure Division) (CID). The information/nomenclature used is the same as the Pipeline Safety Division uses and creates a real confusion and loss of time and effort to evaluate the inspections, findings, and compliance records for the pipeline safety division. Action by the RRCTX to address this situation is vital to the PHMSA State Programs to ensure the records for Pipeline Safety are verifiable in an effective and efficient way.**

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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:

Yes. No issues noted. Program inspectors do a good job documenting inspections results to support unsatisfactory findings and possible areas of concern.

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

Evaluator Notes:

Yes, the inspectors monitor and review operator and contractor OQ qualifications during field inspections.

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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 <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? | 2 | 1 |
|---|--|---|---|

Evaluator Notes:

- A. The state has set up annual meetings with one of its largest operators to discuss safety related issues but has not covered the DIMP process yet. They plan to initiate meetings with their largest operators and discuss the DIMP process with each annually.
- B. Yes, the state is verifying this with each DIMP program inspection.
- C. Yes, the state is verifying this with the operators of low pressure systems.

One point lost for improvement needed in annual meetings with states largest operators on DIMP plans and programs.

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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 <ul style="list-style-type: none"> 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? | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

No change from prior years. NTSB recommendations imbedded into program inspection forms.

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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:

Yes, the TX RRC form has incorporated the NTSB recommendations and ADB questions.

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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:

- A. Compliance correspondence sent to appropriate company officials.
- B. Unsatisfactory results/Probable violations sufficiently documented to support findings.
- C & D. Violations tracked through the PIPES database.
- E. Compliance actions issued for all PV's discovered.
- F. The program did refer certain inspections to direct enforcement. Penalties have been assessed and collected but not in amounts that would act as a deterrent. Civil penalty amounts noted in state rules do not align with nor reference DOT maximum penalties.
- G&H. Yes
- I&J. Executive Closing Summary detailing inspection findings typically issued to the operator at the time of the exit interview satisfying the 30 and 90-day requirements. Most compliance letters issued to operators within one to two weeks after completion of the inspection.

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

- Yes. No issues noted. No change from prior years.
- A. The program utilizes a 24-hour notification system which notifies the on-call engineer.

B. Yes, the program maintains records of operator incident notifications and copies of NRC reports. C. Yes D&E &F. The program utilizes PHMSA Form 11 and TXRRRC Incident Investigation Reports to document on-site investigations. The program does a good job documenting observations, contributing factors and recommendations to prevent reoccurrences.
G. Yes
H. The program maintains excellent communications with PHMSA AID.
I. Incident information shared at NAPSR regional and national meetings, and operator seminars.

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

Yes, the evaluation and chairman's letter went out to the state on 7/26/2022, and the state's response was sent on 8/30/2022

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

Yes, The seminar was conducted on August 8-10, 2022. Alan Mayberry and Chris Ruhl and Chris McLaren attended and gave presentations.

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:

Yes, this is included in each standard comp inspection.

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:

Yes, website has pipeline safety section which provides information to stakeholders.

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:

Yes, the state has 2 individuals assigned follow up on all WMS work flow. The PM has a monthly reminder set to go in and ensure all actions are closed. This will be added to their procedures before next year's evaluation.

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

Yes, the RRC responded to surveys by NAPSR and PHMSA

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:

Yes, the state has three active waivers and has set up a calendar reminder to verify each one on an annual basis.

16 Were pipeline program files well-organized and accessible?

Info Only Info Only

Info Only = No Points

Evaluator Notes:

NO, **This evaluation was hampered by the RRC Texas using the same data base, (PIPES) to store the information and records for their new division, "Critical Infrastructure Division) (CID). The information/nomenclature used is the same as the Pipeline Safety Division uses and creates a real confusion and loss of time and effort to evaluate the inspections, findings, and compliance records for the pipeline safety division. Action by the RRCTX to address this situation is vital to the PHMSA State Programs to ensure the records for Pipeline Safety are verifiable in an effective and efficient way.

17 Discussion with State on accuracy of inspection day information submitted into State Inspection Day Calculation Tool (SICT). Has the state updated SICT data?

3

3

Yes = 3 No = 0 Needs Improvement = 1-2

Evaluator Notes:

Yes, the state has worked on keeping the SICT up to date.
SICT was 6713 for 2022 and the state completed 9327

18 Discussion on State Program Performance Metrics found on Stakeholder Communication site.\ <http://primis.phmsa.dot.gov/comm/states.htm?nocache=4805>

Info Only = No Points

Evaluator Notes:

Texas

State Program Metrics: 2022

Damage Prevention: The numbers have increased from 2021 at 3.3 to 3.7 in 2022. What's up and what are you going to do to fix it?

Inspection days per 1000 mile of gas pipe: The number of days has decreased from 42.70 in 2020 to 38.01 in 2021.

Inspection Days per MMO/LPG Unit: The number of days has moved down from 0.70 in 2020 to 0.57 in 2021.

Inspection days per 1000 mile of HL pipe: The inspection days for HL pipelines has gone up from 68.65 in 2019 to 82.54 days in 2020.

Inspector Qualifications: The gas pipeline inspector qualifications have increased in all categories except Additional Training from 2020 to 2021. It is the same with the HL inspector training.

Gas Distribution system leaks: Total leaks repaired per 100 miles of pipe have increased for the third year in a row from 378 in 2020 to 421 in 2022. Hazardous leaks repaired increased from 168 in 2021 to 173 in 2022. The number of leaks scheduled for repairs decreased from 236 in 2021 to 222 in 2022.

Gas pipeline enforcement program evaluation:

The annual gas evaluation score went from 85 in 2019 to 100 in 2020. The HL score did the same.

Incident evaluation Program: Both programs have been at 100 since 2016.

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:

Discussed at 8/8-10/2022 seminar with operators.

20 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

D1, Loss of 5 points for failure to meet inspection intervals

D4, One point lost for improvement needed in annual meetings with states largest operators on DIMP plans and programs.

Total points scored for this section: 44
Total possible points for this section: 50



- 1 Operator, Inspector, Location, Date and PHMSA Representative (enter specifics into the Info Only Info Only comments box below)
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. City of Rockport, TX - DIMP

Last DIMP conducted in 2019

Yes, Operator had City Rep. Robert Ramos and Consultant Simon Pena Jr. Present at inspection

Observed Macey Damron as Lead and Michael Nuernberg inspector

2. Atmos Energy - Greenville, Tx - Transmission Standard Inspection - Records and Field observed by Don Martin

The inspection unit was last inspected on July 2, 2021. Atmos Energy was represented by Greg Elmore, Operations Supervisor.

Joshua Snowdy, Railroad Commission of Texas (RCT) conducted the inspection. Joshua has four years of experience with the RCT.

- 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:

1. Yes, the inspector used the states DIMP form. It contains the PHMSA form questions as well as the states questions for their rules.

2. Atmos Energy

Yes, the inspector used the RCT's "Standard Comprehensive Inspection Checklist of a Gas Transmission Pipeline".

- 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:

1.

A. Yes, procedures were adequately reviewed to determine compliance.

B. yes, the inspector requested and reviewed records from the City for 2020 - 2022.

C. Field inspections completed during the Standard Comprehensive inspection conducted two weeks prior to this DIMP inspection.

D. there was a lot of focus on the TXRRC regulations for the replacement of 8% of suspect pipe annually.

E. the inspection was of adequate length for the size of the system.

2. Atmos Energy

A. Procedures related to records and field inspection portions of the checklist were reviewed.

B. Yes, all records were reviewed for the three systems under inspection.

C. Yes, the inspection was thorough on field activities and testing.

D. No other activities need comment.

E. The inspection was thorough and done within a reasonable time frame.

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

Evaluator Notes:

1. Yes, the inspector showed adequate knowledge of the pipeline safety program and regulations by the questions asked of the operator. Requiring them to explain and demonstrate their understanding of their DIMP and the regulations.
 2. Atmos Energy
Yes, the inspector exhibited good knowledge of the regulations and asked probing questions. Mr. Snowdy has completed all of the required training courses for a Standard Inspection.
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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 |
|--|---|---|

Evaluator Notes:

1. Yes, on the last day of the inspection. 5 PV's were identified and discussed in detail.
 2. Atmos energy
Yes, at the end of the inspection. One Probable Violation was discussed but the final determination would depend on additional information to be provided by Atmos Energy.
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- | | |
|---|---------------------|
| 6 Was inspection performed in a safe, positive, and constructive manner ?
Info Only = No Points <ol style="list-style-type: none">a. No unsafe acts should be performed during inspection by the state inspectorb. 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 | Info Only Info Only |
|---|---------------------|

Evaluator Notes:

1.
 - A. No unsafe acts were observed
 - B. Field was done previously during Standard Comp
 - C. None
 2. Atmos Energy
 - A. Inspection was conducted in a safe manner.
 - B. Valve inspections, cathodic protection test readings taken, atmospheric corrosion, odorant concentration testing, and general observations of above ground markers and signs.
 - C. No best practices were identified for sharing.
 - D. None
-

- | | |
|--|---------------------|
| 7 General Comments:
Info Only = No Points | Info Only Info Only |
|--|---------------------|

Evaluator Notes:

1. None at this time
 2. Atmos Energy
Inspector conducted the inspection in a courteous and respectful manner.
-

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**

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

Evaluator Notes:

The TXRRC reviews operator's annual and incident reports to complete the yearly risk assessment for their work plan. They also track top ten root causes, types of equipment, work performed and excavators in order to thoroughly and completed analyze the entire data for trends and issues.

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

Evaluator Notes:

The TXRRC reviews operator's annual and incident reports to complete the yearly risk assessment for their work plan. They also track top ten root causes, types of equipment, work performed and excavators in order to thoroughly and completed analyze the entire data for trends and issues.

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

Evaluator Notes:

The TXRRC has a dedicated damage prevention department who analyzes data and provides support to pipeline safety related to excavation damages. Discussed with the TXRRC the need to review and analyze Part D data provided in Annual Reports.

- | | | | |
|----------|--|---|---|
| 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. | 2 | 2 |
|----------|--|---|---|

- d. Has the state verified the operator is appropriately focusing damage prevention education and training to address the causes of excavation damages?

Evaluator Notes:

Yes their damage prevention personnel and 811 collect damage data which includes damages per 1,000 locates, top ten root causes, types of equipment, work performed and excavators in order to thoroughly and completed analyze the entire data for trends and issues. The damage prevention personnel analyze data and encourage the utilization of best practices.

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

NONE

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:

TX RRC 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:

TX RRC 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:

TX RRC 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:

TX RRC 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:

TX RRC 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:

TX RRC 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