



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

1200 New Jersey Avenue SE
Washington DC 20590

2023 Gas State Program Evaluation

for

Louisiana Department of Energy and Natural Resources

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



2023 Gas State Program Evaluation -- CY 2023

Gas

State Agency: Louisiana

Agency Status:

Date of Visit: 04/01/2024 - 04/19/2024

Agency Representative: Steve Giambrone, Director, Pipeline Safety Division
Michael Peikert, Assistant Director, Pipeline Safety Division
Ben Brannan, Conservation Enforcement Specialist

PHMSA Representative: Glynn Blanton, US DOT/PHMSA State Evaluator

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

Name/Title: Benjamin C. Bienvenu, Commissioner
Agency: Louisiana Department of Natural Resources
Address: PO Box 94275
City/State/Zip: Baton Rouge, LA 70804-9275

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 2023 (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	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	10	10
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. Using PHMSA Portal a review found jurisdictional authority, number of operators 304 and units 429 were correct. The number of units inspected was 78.8% and operators 72.7%. No issues.
- b. Total number of inspection person days were 1696. Met the 20% requirement (296) construction days.
- c. Compared units to attachment 1 and found no issues.
- d. Five incidents occurred in CY2023. Compared information to data in PHMSA Portal and found information correct. Cause coding was correct.
- e. Number of violations to be corrected at end of CY was found correct. They issued 68 compliance actions, assessed \$54,750 in penalties and collected \$17,600.
- f. List of records kept appear to be reasonable and match data in their office.
- g. Total number of staff is 37. Total number of person-years were 24. Two category I, eighteen category II and five category III inspectors. Categories match information in TQ Black board system.
- h. Adopted \$200/\$2 M civil penalty amounts. All regulations and amendments were adopted in accordance to required time frame. No issues.
- i. Information was light and improvement is needed in providing additional data in meeting the nine elements of an effective damage prevention program.

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:

- a. Louisiana Department of Natural Resources (LDNR) Pipeline Safety Program Guidelines, Section 5, Types of Inspections, Sub-Sect 3.1 addresses this item.
- b. Louisiana Department of Natural Resources (LDNR) Pipeline Safety Program Guidelines, Section 5, Types of Inspections, Sub-Sect 4.3 addresses this item.
- c. Louisiana Department of Natural Resources (LDNR) Pipeline Safety Program Guidelines, Section 5, Types of Inspections, Sub-Sect 4.4 addresses this item.
- d. Louisiana Department of Natural Resources (LDNR) Pipeline Safety Program Guidelines, Section 5, Types of Inspections, Sub-Sect 4.6 addresses this item.
- e. Louisiana Department of Natural Resources (LDNR) Pipeline Safety Program Guidelines, Section 5, Types of Inspections, Sub-Sect 4.2 addresses this item.
- f. Louisiana Department of Natural Resources (LDNR) Pipeline Safety Program Guidelines, Section 5, Types of Inspections, Sub-Sect 4.1 addresses this item.
- g. Louisiana Department of Natural Resources (LDNR) Pipeline Safety Program Guidelines, Section 5, Types of Inspections, Sub-Sect 3.1,2.4 addresses this item.

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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:

- Yes, LDNR Pipeline Safety Program Guidelines, Section 2, Procedures for determining inspection priorities, address items a thru f.

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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:

- a. Yes, LDNR Pipeline Safety Program Guidelines, Section 10a provides the agency's enforcement procedures for identify

- steps to be taken when a non-compliance is found to resolution of the non-compliance item(s). Additionally, Title 43 Natural Resources, Subpart 3 Pipeline Safety, Chapter 5 in ?507 provides procedures on Letter of Noncompliance and notification requirements.
- b. Yes, LDNR Pipeline Safety Program Guidelines, section 5, subpart 4.7, Re-Inspections (Compliance Follow-up), describes this item.
- c. Yes, LDNR Pipeline Safety Program Guidelines, Section 8, Procedures for Reviewing Inspections

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- 4** (Incident/Accident Investigations) Does the state have written procedures to address state actions in the event of an incident/accident? 3 3
 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. Yes, LDNR Pipeline Safety Program Guidelines, section 5, subpart 4.5, Investigating Incidents/Accidents describes this item.
- b. Section 9, GUIDELINES FOR FORMING AN ACCIDENT RESPONSE TEAM address this item.

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

Evaluator Notes:

No loss of points occurred in this section of the review.

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, a review of TQ training records show twenty-two inspectors are qualified gas inspectors, five have completed Gas IM training to be the lead in a DIMP or TIMP inspections and two have completed the Root Cause course. Five inspectors have successfully completed the LNG course and qualified to inspect those facilities.

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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, Michael Peikert is qualified to perform all types of inspections. He has been with LDNR for 12 years and program manager for seven years. He has demonstrated an excellent knowledge in performing the function of a state program manager.

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| 3 | General Comments:
Info Only = No Points | Info Only | Info Only |
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Evaluator Notes:

No loss of points occurred in this section of the review.

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:

Yes, random generated operators to be checked for this evaluation period consisted of 22 distribution, 17 transmission, 1 LNG, 5 gathering systems, and 16 Master meter operators. Using LDNR SONRIS System confirmed each operator was inspected in accordance with LDNR written procedures. Reviewed inspection reports, date of inspections, letters sent to operators, response to violations cited, corrected action taken and found inspections were conducted in accordance with established time intervals not to exceed 5 years. Listed below is the name of the operators checked for this evaluation period:

Gas Distribution Systems:

City of Zachary Water & Gas Distribution System, City of Patterson Gas Department, Town of Kinder Gas System, City of Donaldsonville, Livingston Parish Gas Util District, Port Barre Municipal System, South Coast Gas Company, Atmos Energy Corporation, Terrebonne Parrish Consolidated Government, Pointe Coupee Parish Gas Util District, Village of Livonia, West Baton Rouge Parish Natural Gas, Town of Berwick, City of Alexandria, Madisonville Gas System, Town of Waterproof, Dequincy Gas Department, Nezpieque Gas System, Baker Utility System, Town of Basile and Forrest Hill Gas System. LNG System: HR Nu Blue Energy, LLC. Transmission: Mission Natural Gas, ORX Resources, Boardwalk Louisiana Midstream LLC, Cams Midstream, TGG Pipeline, Air Liquid Large Industries, Citgo Petroleum Corporation, Energy Transfer Company, Arcadia Gas Storage, Aethon United Pipeline, Centerpoint Energy Intrastate Pipelines, Mid Louisiana Transmission, Lafitte Gas Pipeline, Pontchartrain Natural Gas System, EnLink Processing Services, Phillips 66 Pipeline LLC, and Louisiana Generating LLC. Gas Gathering: DTE Louisiana Gathering, Ibex Midstream LLC, White Marlin Midstream LLC, EnLink Processing Services and Targa Resources Operating LLC. Master Meter: LDCU-University of LA at Monroe, Lasalle Detention Facility, Catholic Diocese of Baton Rouge, LDWF-Wildlife & Fisheries, LDCU-Louisiana College, Housing Authority of St. John the Baptist, LDHH- Pinecrest Support & Services Center, LDPSC- Basile Correctional Center, Housing Authority of New Orleans, LDHH-Huey P Long Hospital, Standard Enterprise, LDPC-LA State Penitentiary, LDCU-LA State University Alexandria, LDCU Xavier University, Catholic Diocese of Houma-Thibodaux and LDCU- Tulane University.

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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, using LDNR SONRIS System reviewed 22 distribution, 17 transmission, 1 LNG, 5 gathering and 16 Master meter operator inspection reports and forms. All forms were complete with required information in each section.

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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:

Yes, using LDNR SONRIS System reviewed the random selected operators and found OQ inspections were conducted and meet the established time frame. LDNR also conducts OQ Protocol 9 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 <ol 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 | 2 |
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Evaluator Notes:

- a. The largest operators are Atmos Energy, Centerpoint Energy, Entergy Louisiana & Entergy New Orleans. A review of data in SONRIS system found all were inspected in CY2023.
- b. Yes, this is discussed with the operator during the DIMP inspection.
- c. Yes, only one system in the State of Louisiana has a low-pressure system. The system is Energy New Orleans Gas Company. During the DIMP inspection, this item is reviewed with the operator.

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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 <ol 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 |
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Evaluator Notes:

- a. LDNR standard inspection form has a question pertaining to 192.459 regarding this item on page 52.
- b. This item 192.617(a) is listed on page 10 of LDNR standard inspection form.
- c. This item and question pertaining to 192.617 (a) is listed on page 16 of LDNR standard inspection form.
- d. This item 192.609(b)(11) and question is listed in LDNR inspection form on page 9.
- e. This item 192.614(a) and question is listed on page 11 of LDNR Inspection form.
- f. Inside meter sets and regulators have been found with Energy Louisiana New Orleans. Operator is working on having the meter set moved outside of the structure.

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, a review of LDNR standard inspection form found a question on this item 192.613(a) on page 10 pertaining to advisory bulletins. Additionally, this information is listed on LDNR website.

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
	<ul style="list-style-type: none"> 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. Yes, operators are required annually to file with the agency electronically the name of the company officers. This includes the company emergency & DOT representative, compliance officer, board member and other official (Mayor). The list is used to mail out letters of non-compliance to the company.
- b. Yes, probable violations are documented in their SONRIS System.
- c. Yes, action is taking during inspections to clear violations.
- d. Yes, probable violations are reviewed quarterly.
- e. Yes.
- f. Yes, in CY2023 LDNR assessed \$54,750 and collected \$17,600 in penalties from thirty-two operators.
- g. Yes, Program Manager reviews with Director the compliance action letter before it is signed by the Director provided the fine amount is \$500 or less. If the penalty is more than \$500, the LDNR Commissioner will sign the letter.
- h. Yes, the operator can request an informal meeting or show cause hearing.
- i. Yes
- j. Yes

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
	<ul style="list-style-type: none"> 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:

In CY2023 five incidents occurred. Two incidents occurred on Centerpoint Energy 06-12-23 & 08-16-2023. One incident occurred on a gas transmission system owned by Acadian Gas Pipeline System on 01-26-2023. Two incidents occurred on gas gathering systems owned by Energy Transfer Company and Williams MLP Operating on 07-17-2023 & 07-12-2023. A review of PHMSA Portal confirmed the incidents.

- a. Yes, all incidents are investigated by the agency staff members. The operators are required to notify LDNR within one hour of an incident and the agency has a hot line notification system to inform the staff of the incident.
- b. Yes, a review of LDNR records found notifications are recorded in the Leak Report/Incidents data base.
- c. All incidents are investigated by LDNR.
- d. - f. Yes, a review of LDNR records found a report was performed and completed on each incident.
- g. No violations were found, or compliance action was taken.
- h. Yes, LDNR assisted AID in monitoring their information and investigation until the area was safe.
- i. LDNR continue to share information on incidents at the NAPSRSW meetings.

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:

No response was required.

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:

They conduct annual seminar with the operator. The most recent was conducted on August 14-17, 2023, in New Orleans, LA.

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:

Yes, this item 192.29(b) is located on LDNR standard inspection form page 4.

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).	1	1
	Yes = 1 No = 0 Needs Improvement = .5		

Evaluator Notes:

Yes, this is accomplished via the state pipeline safety seminar and website. Also, they conduct a small operator meeting to train operators. This meeting was held on November 5-6, 2023, at Vidalia, LA.

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

Evaluator Notes:

Yes, a review of PHMSA Portal found two safety related condition reports submitted by Boardwalk and Atmos Energy Corporation-Trans LA Gas Pipeline. Follow-up was performed on each report.

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

Evaluator Notes:

Yes, they participated in each survey received from NAPSRS. A check and review of emails confirm their responses. No issues.

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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:

A review of PHMSA website found two active waivers. They were PHMSA-2016-0081 Louisiana State Waiver PL Order No. 8379 Maurepas Pipeline, LLC- Waiver Renewal to December 31, 2026, and PHMSA-2022-0013 Louisiana State Waiver PL Order No. 8405 (Amended) Harvest Midstream Company- Waiver to March 3, 2032.

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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, a review of office files and database confirm records are maintained correctly.

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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:

A review of SICT information and discussion with Program Manager was conducted. Program Manager has a good understanding of the data required each year.

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

A review of state program performance metrics found damages per 1,000 was 2.8 and increase from the previous year. Total leaks repaired is down from 255 to 213. The trend shows a downward direction in all leaks.

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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 = No Points
a. https://pipelinesms.org/
b. Reference AGA recommendation to members May 20, 2019 | Info Only | Info Only |
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Evaluator Notes:

During the recent Pipeline Safety Seminar in New Orleans, LA information on this topic was presented by Brian Dresel Energy Worldnet.

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| 20 | General Comments:
Info Only = No Points | Info Only | Info Only |
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Evaluator Notes:

No loss of points occurred in this section of the review.

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 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:

- This was an OQ & Drug & Alcohol inspection.
- This unit was last inspected on April 16, 2019.
- Yes, the following individuals and company compliance consultant, Everline Compliance LLC, were present. George Thorpe & Will Junkin ? CLECO Power LLC and Schuyler Dickerson ? Everline Compliance.
- Ben Brannan ? LDENR Inspector has not been previously reviewed.

- 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, Ben Brannan was using Louisiana Department of Energy and Natural Resources OQ Plan Review & Drug & Alcohol Forms for this 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:

- Yes, questions were asked about the company's written procedures to ensure compliance with the pipeline safety standards.
- Yes, a review of the previous inspection provided information on asking questions about changes made in their procedures.
- Yes, the field inspection observed an employee following the company's procedures on performing the task of taking pipe-to-soil readings, locating the transmission line and regulator station maintenance.
- N/A
- Yes, the two-day inspection was adequate and provided information in determining the operator's compliance.

- 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:

Yes, Ben Brannan demonstrated an understanding of the regulations. He asked detailed questions to the operator representatives and recorded their responses. Mr. Brannan has completed all TQ courses and a qualified gas inspector.

- 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:

Yes, an exit interview was conducted each day after the inspection. Information was provided to the operator on areas of concern. No violations were found or cited.

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- 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. Yes, the filed inspection was performed in a safe manner. In this regard, steel toe boots, safety vest, eye and ear protection were worn.
 - b. The inspector monitored the employee performance on locating lines, cathodic protection, and regulator station maintenance.
 - c. A safety meeting was performed prior to entering the operator's station and equipment.
-

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

Evaluator Notes:

No loss of points occurred in this section of the review.

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:

Yes, a review of annual reports is conducted by the Director and Program Manager each year. Annual report data is entered into an Excel spreadsheet and compared to previous year information. An analysis on trends pertaining to leakage, bare steel and subpart F damages is conducted. If an error is found or a trend is showing an upward swing they contact the operator to review or correct their data. The review of the annual report is described in their Standard Operating Procedures manual. A review of current data for 2023 found state damages per 1,000 locate requests was 2.78. The number of damages were 1,927. This number was lower from previous year of 2,029. After their reviews they continue to follow up with operators who have a significant number of twenty or more damages from previous year to determine what action they are taking to lower damages to their facilities.

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

Yes, they review the annual report data and share the information with the operators at separate meetings when damages are higher from previous year. As a general rule, when an operator has twenty or more damages they are contacted and asked to attend a separate meeting.

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

- a. Yes, this is checked during the Director's review of the annual report. Information on reviewing the annual reports will be added to their SOP document to assist their staff in checking all items listed in the annual report.
- b. Yes, this is investigated and checked on a complaint or damage report submitted to their agency.
- c. Yes
- d. Yes
- e. Yes.
- f. The number of damages from mismark in 2023 was 444. This number is down for previous year of 483.
- g. The number of damages from not locating within time requirements in 2023 was 505. This number is down for previous year of 572.
- h. Yes, when a damage occurs due to a mapping error, the agency is requiring the operator to update their mapping system.

- i. Yes, the agency is requiring the operator via a compliance to correct the mapping system.
j. The number of Excavation Practices Not Sufficient in 2023 was 953. This number is the same for previous year of 953.

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?	2	2
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Yes = 2 No = 0 Needs Improvement = 1

- a. What stakeholder group is causing the highest number of damages to the pipelines? Operator, contractor, locating company or public.
- b. Has the state verified the operator is appropriately focusing damage prevention education and training to stakeholders causing the most damages?
- c. Has the state evaluated which of the following best describes the reason for the excavation damages; i.e., operator or contractor not following written procedures, failure to maintain marks, failure to support exposed facilities, failure to use hand tools were required, failure to test-hole (pot hole), improper backfilling practices, failure to maintain clearance or insufficient excavation practices.
- d. Has the state verified the operator is appropriately focusing damage prevention education and training to address the causes of excavation damages?

Evaluator Notes:

- a. The highest number of damages is coming from the stakeholder group - contractors.
- b. Yes, operators are having individual meetings with stakeholders who are causing damages and educating them about their facilities. Additionally, other meetings that address this issue with the operators are Digger's Night Out, UCC, and Pipeline Association of Louisiana.
- c. Yes, they have found most excavation damage has resulted in "failure to maintain clearance". A review of the damages indicated the contractor has failed to maintain clearance.
- d. Yes, the state has monitored the operators and verified they are addressing causes of excavation damages in their training and awareness campaigns.

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

Evaluator Notes:

No loss of points occurred in this session of the review.

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

