



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

1200 New Jersey Avenue SE
Washington DC 20590

2024 Underground Natural Gas Storage State Program Evaluation UNGS

for

Minnesota Office of Pipeline Safety

Document Legend

PART:

- O -- Representative, Dates and Title Information
- A -- Progress Report and Program Documentation Review
- B -- Program Inspection Procedures
- C -- Program Performance
- D -- Compliance Activities
- E -- Incident Investigations
- F -- Damage Prevention
- G -- Field Inspection
- H -- 60106 Agreement



2024 Underground Natural Gas Storage State Program Evaluation UNGS -- CY 2024
Underground Natural Gas Storage

State Agency: Minnesota
Agency Status:
Date of Visit: 08/05/2025 - 08/06/2025
Agency Representative: Adam Ratzlaff, John Wolfgram
PHMSA Representative: Rex Evans
Commission Chairman to whom follow up letter is to be sent:
Name/Title: Bob Jacobson, Commissioner
Agency: Minnesota Department of Public Safety
Address: 445 Minnesota St., Suite 1000
City/State/Zip: St. Paul, MN 55101

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

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 2024 (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	9	9
B Program Inspection Procedures	14	14
C Program Performance	34	34
D Compliance Activities	21	21
E Incident Investigations	13	13
F Damage Prevention	4	4
G Field Inspection	11	11
H 60106 Agreement	0	0
TOTALS	106	106
State Rating		100.0



PART A - Progress Report and Program Documentation Review

Points(MAX) Score

1	Accuracy of Jurisdictional Authority and Operator/Inspection Units Data - Progress Report Attachment 1 Yes = 1 No = 0 Needs Improvement = .5 Not Applicable = NA	1	1
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Evaluator Notes:
satisfactory - one operator

2	Review of Inspection Days for accuracy - Progress Report Attachment 2 Yes = 1 No = 0 Needs Improvement = .5 Not Applicable = NA	1	1
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Evaluator Notes:
satisfactory - one operator - in IA

3	Accuracy verification of Operators and Operators Inspection Units in State - Progress Report Attachment 3 Yes = 1 No = 0 Needs Improvement = .5 Not Applicable = NA	1	1
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Evaluator Notes:
satisfactory

4	Accuracy verification of Compliance Activities - Progress Report Attachment 5 Yes = 1 No = 0 Needs Improvement = .5 Not Applicable = NA	1	1
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Evaluator Notes:
no issues -

5	Were Underground Natural Gas Storage program files well-organized and accessible? - Progress Report Attachment 6 Yes = 2 No = 0 Needs Improvement = 1 Not Applicable = NA	2	2
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Evaluator Notes:
satisfactory

6	Was employee listing and completed training accurate and complete? - Progress Report Attachment 7 Yes = 1 No = 0 Needs Improvement = .5 Not Applicable = NA	1	1
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Evaluator Notes:
satisfactory

7	Verification of Part 192 and 199 Rules and Amendments - Progress Report Attachment 8 Yes = 1 No = 0 Needs Improvement = .5 Not Applicable = NA	1	1
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Evaluator Notes:
satisfactory

8	List of Planned Performance - Did state describe accomplishments on Progress Report in detail - Progress Report Attachment 10 Yes = 1 No = 0 Needs Improvement = .5 Not Applicable = NA	1	1
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Evaluator Notes:
satisfactory

9	General Comments: Info Only = No Points	Info Only	Info Only
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Evaluator Notes:



Total points scored for this section: 9
Total possible points for this section: 9



PART B - Program Inspection Procedures

Points(MAX) Score

- | | | | |
|---|--|---|---|
| 1 | Does State have written inspection procedures?
Yes = 2 No = 0 Needs Improvement = 1 Not Applicable = NA | 2 | 2 |
|---|--|---|---|

Evaluator Notes:
satisfactory

- | | | | |
|---|--|---|---|
| 2 | (Standard Inspections) Do Standard Inspection procedures give guidance to State inspectors that ensure consistency for inspections conducted by the State? The following elements should be addressed at a minimum. (Review of Procedures, Records, or Field Items to complete a PHMSA UNGS IA Question Set (RESERVOIR or CAVERN) ? 2019.12.31)
Yes = 2 No = 0 Needs Improvement = 1 Not Applicable = NA
a. Pre-Inspection Activities
b. Inspection Activities
c. Post Inspection Activities | 2 | 2 |
|---|--|---|---|

Evaluator Notes:
satisfactory

- | | | | |
|---|--|---|---|
| 3 | (Integrity Management Inspections) Do Integrity Management Inspection procedures give guidance to State inspectors that ensure consistency for inspections conducted by the State? The following elements should be addressed at a minimum. (Integrity Testing and Maintenance: Observing Integrity Testing (Tubing, Casing, Cement), reservoir integrity monitoring, & FLIR Camera inspections.)
Yes = 2 No = 0 Needs Improvement = 1 Not Applicable = NA
a. Pre-Inspection Activities
b. Inspection Activities
c. Post Inspection Activities | 2 | 2 |
|---|--|---|---|

Evaluator Notes:
satisfactory

- | | | | |
|---|--|---|---|
| 4 | (Design, Testing, and Construction Inspections) Do Design, Testing, and Construction Inspection procedures give guidance to State inspectors that ensure consistency for Inspections conducted by the State? The following elements should be addressed at a minimum. (Review of procedures, records, and field activities to complete PHMSA UNGS IA Question Set (RESERVOIR or CAVERN CONSTRUCTION) ? 2019.12.31. Inspection activities for well design, drilling and completion activities, well workover, reservoir maintenance/repair activities, and abandonment (Plugging and cementing), temporary abandonment, and restoration.)
Yes = 1 No = 0 Needs Improvement = .5 Not Applicable = NA
a. Pre-Inspection Activities
b. Inspection Activities
c. Post Inspection Activities | 1 | 1 |
|---|--|---|---|

Evaluator Notes:
satisfactory

- | | | | |
|---|---|---|---|
| 5 | (Wellhead Inspections) Do Wellhead Inspection procedures give guidance to State inspectors that ensure consistency for Inspections conducted by the State? The following elements should be addressed at a minimum.
Yes = 1 No = 0 Needs Improvement = .5 Not Applicable = NA
a. Pre-Inspection Activities
b. Inspection Activities
c. Post Inspection Activities | 1 | 1 |
|---|---|---|---|

Evaluator Notes:



satisfactory

-
- 6** (Drug and Alcohol Inspections) Do Drug and Alcohol Inspection procedures give guidance to State inspectors that ensure consistency for Inspections conducted by the State? The following elements should be addressed at a minimum. (Using AI to complete the federal Comprehensive Drug and Alcohol program (Form 3.1.11). Includes time conducting joint inspections with other agencies for this type of inspection.) 1 1
- Yes = 1 No = 0 Needs Improvement = .5 Not Applicable = NA
- a. Pre-Inspection Activities
 - b. Inspection Activities
 - c. Post Inspection Activities

Evaluator Notes:
satisfactory - multiple programs

- 7** Does inspection plan address inspection priorities of each operator, and if necessary each unit, based on the following elements? 5 5
- Yes = 5 No = 0 Needs Improvement = 1-4 Not Applicable = NA
- a. Length of time since last inspection (Within five year interval per inspection unit) Yes No Needs Improvement
 - b. Operating history of operator/unit and/or location (includes leakage, incident, Integrity Testing, and compliance activities) Yes No Needs Improvement
 - c. Type of activity being undertaken by operators (i.e. construction) Yes No Needs Improvement
 - d. Locations of operator's inspection units being inspected - (Geographic areas, Population Density, etc) Yes No Needs Improvement
 - e. Process to identify high-risk inspection units considering integrity threats Yes No Needs Improvement
 - f. Are inspection units broken down appropriately? Yes No Needs Improvement

Evaluator Notes:

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

Evaluator Notes:

Total points scored for this section: 14
Total possible points for this section: 14



PART C - Program Performance

Points(MAX) Score

- 1** Was ratio of Total Inspection person-days to total person days acceptable? 5 5
Yes = 5 No = 0 Not Applicable = NA
A. Total Inspection Person Days (Attachment 2):
6.93
B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):
220 X 0.09 = 19.24
Ratio: A / B
6.93 / 19.24 = 0.36
If Ratio >= 0.38 Then Points = 5, If Ratio < 0.38 Then Points = 0
Points = 0

Evaluator Notes:
satisfactory

- 2** Has each inspector and program manager fulfilled the T Q Training Requirements? (See Guidelines Appendix C for requirements) Chapter 4.3.1 5 5
Yes = 5 No = 0 Needs Improvement = 1-4 Not Applicable = NA

Evaluator Notes:
satisfactory

- 3** Does State use the PHMSA Inspection Assistant (IA) program to document inspections? 2 2
Yes = 2 No = 0 Needs Improvement = 1 Not Applicable = NA

Evaluator Notes:
satisfactory

- 4** Did records and discussions with Program Manager indicate adequate knowledge of PHMSA program and regulations? Chapter 4.1,8.1 2 2
Yes = 2 No = 0 Needs Improvement = 1 Not Applicable = NA

Evaluator Notes:
satisfactory

- 5** Did state respond to PHMSA's evaluation letter on previous evaluation within 60 days and correct or address any noted deficiencies? (If necessary) Chapter 8.1 2 2
Yes = 2 No = 0 Needs Improvement = 1 Not Applicable = NA

Evaluator Notes:
satisfactory

- 6** Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1 5 5
Yes = 5 No = 0 Needs Improvement = 1-4 Not Applicable = NA

Evaluator Notes:
satisfactory - one operator

- 7** Did inspection form(s) cover all applicable code requirements addressed on Federal Inspection form(s)? Chapter 5.1 2 2
Yes = 2 No = 0 Needs Improvement = 1 Not Applicable = NA

Evaluator Notes:
satisfactory

- 8** Did State complete all applicable portions of inspection forms? 2 2

Yes = 2 No = 0 Needs Improvement = 1 Not Applicable = NA

Evaluator Notes:

satisfactory

- 9** Has the state reviewed Operator Annual reports, along with Incident/Accident reports, for accuracy and analyzed data for trends and operator issues? 2 2
Yes = 2 No = 0 Needs Improvement = 1 Not Applicable = NA

Evaluator Notes:

satisfactory - combo program

- 10** Is the state verifying operators are conducting drug and alcohol tests as required by regulations? This should include verifying positive tests are responded to in accordance with program. 49 CFR 199 2 2
Yes = 2 No = 0 Needs Improvement = 1 Not Applicable = NA

Evaluator Notes:

satisfactory - combo program

- 11** Does the state have a mechanism for communicating with stakeholders regarding the inspection and enforcement program? (This should include making enforcement cases available to the public). 1 1
Yes = 1 No = 0 Needs Improvement = .5 Not Applicable = NA

Evaluator Notes:

satisfactory

- 12** Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.3 1 1
Yes = 1 No = 0 Needs Improvement = .5 Not Applicable = NA

Evaluator Notes:

satisfactory - na

- 13** Did the state participate in respond to surveys or information requests from PHMSA? 1 1
Yes = 1 No = 0 Needs Improvement = .5 Not Applicable = NA

Evaluator Notes:

satisfactory - combo program

- 14** Did the State forward any potential waivers/special permits to PHMSA for review prior to issuing them to operators? 1 1
Yes = 1 No = 0 Needs Improvement = .5 Not Applicable = NA

Evaluator Notes:

satisfactory - na

- 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. 1 1
Yes = 1 No = 0 Needs Improvement = .5 Not Applicable = NA

Evaluator Notes:

satisfactory - na

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

Evaluator Notes:



Total points scored for this section: 34
Total possible points for this section: 34



PART D - Compliance Activities

Points(MAX) Score

- 1** 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 = 4 No = 0 Needs Improvement = 1-3 Not Applicable = NA
- a. Procedures to notify an operator (company officer) when a noncompliance is identified Yes No Needs Improvement
 - b. Procedures to routinely review progress of compliance actions to prevent delays or breakdowns Yes No Needs Improvement
 - c. Procedures regarding closing outstanding probable violations Yes No Needs Improvement

Evaluator Notes:
satisfactory - combo program

- 2** 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 = 4 No = 0 Needs Improvement = 1-3 Not Applicable = NA
- a. Were compliance actions sent to company officer or manager/board member if municipal/government system (60105 States)? Yes No Needs Improvement
 - b. Document probable violations Yes No Needs Improvement
 - c. Resolve probable violations Yes No Needs Improvement
 - d. Routinely review progress of probable violations Yes No Needs Improvement

Evaluator Notes:
satisfactory - none

- 3** Did State within 30 days of the end of an inspection conduct a post-inspection briefing with the owner or operator of the UNGS facility inspected outlining any concerns identified during the inspection?
Yes = 2 No = 0 Needs Improvement = 1 Not Applicable = NA

Evaluator Notes:
satisfactory

- 4** Did State within 90 days, to the extent practicable, provide the owner or operator with written preliminary findings of the inspection?
Yes = 2 No = 0 Needs Improvement = 1 Not Applicable = NA

Evaluator Notes:
satisfactory

- 5** Did the state issue compliance actions for all probable violations discovered?
Yes = 2 No = 0 Needs Improvement = 1 Not Applicable = NA

Evaluator Notes:

- 6** Did compliance actions give reasonable due process to all parties? Including "show cause" hearing if necessary.
Yes = 2 No = 0 Not Applicable = NA

Evaluator Notes:
satisfactory - na

- 7** Is the program manager familiar with state process for imposing civil penalties? (60105 States)? (describe any actions taken)
Yes = 2 No = 0 Needs Improvement = 1 Not Applicable = NA

Evaluator Notes:

satisfactory

8 Were civil penalties considered for repeat violations, violations which can't be corrected by other means, or violations resulting in incidents (60105 States)? 2 2
Yes = 2 No = 0 Needs Improvement = 1 Not Applicable = NA

Evaluator Notes:
satisfactory - na

9 Can the State demonstrate it is using their enforcement fining authority for safety violations? 1 1
Yes = 1 No = 0 Needs Improvement = .5 Not Applicable = NA

Evaluator Notes:
satisfactory - na

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

Evaluator Notes:

Total points scored for this section: 21
Total possible points for this section: 21



PART E - Incident Investigations

Points(MAX) Score

- 1 Does the state have written procedures to address state actions in the event of an incident/accident? 2 2
Yes = 2 No = 0 Needs Improvement = 1 Not Applicable = NA

Evaluator Notes:
satisfactory

- 2 Does state have adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports? 2 2
Yes = 2 No = 0 Needs Improvement = 1 Not Applicable = NA

Evaluator Notes:
satisfactory

- 3 Did the state keep adequate records of Incident/Accident notifications received? 2 2
Yes = 2 No = 0 Needs Improvement = 1 Not Applicable = NA

Evaluator Notes:
satisfactory

- 4 If onsite investigation was not made, did state obtain sufficient information from the operator and/or by other means to determine the facts to support the decision to not go on-site? Chapter 6 1 1
Yes = 1 No = 0 Needs Improvement = .5 Not Applicable = NA

Evaluator Notes:
satisfactory na

- 5 Were all incidents investigated, thoroughly documented, and with conclusions and recommendations? 3 3
Yes = 3 No = 0 Needs Improvement = 1-2 Not Applicable = NA

- a. Observations and document review Yes No Needs Improvement
b. Contributing Factors Yes No Needs Improvement
c. Recommendations to prevent recurrences when appropriate Yes No Needs Improvement

Evaluator Notes:
satisfactory na

- 6 Did the state initiate compliance action for violations found during any incident/accident investigation? (60106 States forward violations to PHMSA) 1 1
Yes = 1 No = 0 Not Applicable = NA

Evaluator Notes:
satisfactory na

- 7 Did the 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? (validate report data from operators concerning incidents/accidents and investigate discrepancies) Chapter 6 1 1
Yes = 1 No = 0 Needs Improvement = .5 Not Applicable = NA

Evaluator Notes:
satisfactory na

- 8 Does state share lessons learned from incidents with PHMSA? 1 1
Yes = 1 No = 0 Not Applicable = NA



Evaluator Notes:
na

9 General Comments:
Info Only = No Points

Info Only Info Only

Evaluator Notes:

Total points scored for this section: 13
Total possible points for this section: 13



PART F - Damage Prevention

Points(MAX) Score

-
- | | | | |
|----------|--|---|---|
| 1 | Did the state inspector verify UNGS operators are following their written procedures pertaining to notification of excavation, marking, positive response and the availability and use of the one call system? (API 1171 Section 11.10 Public Awareness and Damage Prevention) | 2 | 2 |
|----------|--|---|---|

Yes = 2 No = 0 Needs Improvement = 1 Not Applicable = NA

Evaluator Notes:

satisfactory - combo program

- | | | | |
|----------|--|---|---|
| 2 | Did the state encourage and promote practices for reducing damages to all underground facilities to its regulated companies? (Common Ground Alliance Best Practices, support excavation damage prevention legislation, etc.) | 2 | 2 |
|----------|--|---|---|

Yes = 2 No = 0 Needs Improvement = 1 Not Applicable = NA

Evaluator Notes:

satisfactory - combo program

- | | | | |
|----------|-------------------|-----------|-----------|
| 3 | General Comments: | Info Only | Info Only |
|----------|-------------------|-----------|-----------|

Info Only = No Points

Evaluator Notes:

Total points scored for this section: 4
Total possible points for this section: 4



PART G - Field Inspection

Points(MAX) Score

1 Operator, Inspector, Location, Date and PHMSA Representative Info Only Info Only
 Info Only = No Points
 Name of Operator Inspected:
 Centerpoint Energy
 Name of State Inspector(s) Observed:
 Adam Ratzlaff
 Location of Inspection:
 Virtual 8-5-2025 and Storage Field in Waterville, MN 8-6-2025
 Date of Inspection:
 08-05-2025 to 08-06-2025
 Name of PHMSA Representative:
 Rex Evans

Evaluator Notes:
 Virtual records inspection and field evaluation on the states only storage field in Waterville, MN

2 Was the operator or operator's representative notified and/or given the opportunity to be present during inspection? 1 1
 Yes = 1 No = 0 Not Applicable = NA

Evaluator Notes:
 Yes, operator was present

3 Did the inspector use an appropriate inspection form/checklist and was the form/checklist used as a guide for the inspection? 2 2
 Yes = 2 No = 0 Needs Improvement = 1 Not Applicable = NA

Evaluator Notes:
 they use IA , no issues

4 Did the inspector thoroughly document results of the inspection? 2 2
 Yes = 2 No = 0 Needs Improvement = 1 Not Applicable = NA

Evaluator Notes:
 no issues, following in IA

5 Did the inspector check to see if the operator had necessary equipment during inspection to conduct tasks viewed? 1 1
 Yes = 1 No = 0 Not Applicable = NA

Evaluator Notes:
 satisfactory - na

6 Did the inspector adequately review the following during the field portion of the state evaluation? 2 2
 Yes = 2 No = 0 Needs Improvement = 1 Not Applicable = NA

- | | | | |
|---------------------------|--------------------------------------|--------------------------|---|
| a. Procedures | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. Records | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c. Field Activities | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d. Other (please comment) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:
 no issues, we visited a few wellhead sites around compressor station at Waterville, MN.



7	Did the inspector have adequate knowledge of the underground natural gas safety program and regulations? (Evaluator will document reasons if unacceptable) Yes = 2 No = 0 Needs Improvement = 1 Not Applicable = NA	2	2
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Evaluator Notes:
satisfactory

8	Did the inspector conduct an exit interview? (If inspection is not totally complete the interview should be based on areas covered during time of field evaluation) Yes = 1 No = 0 Not Applicable = NA	1	1
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Evaluator Notes:
satisfactory

9	During the exit interview, did the inspector identify probable violations found during the inspections? (if applicable) Yes = 1 No = 0 Not Applicable = NA	1	NA
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Evaluator Notes:
NA

10	General Comments: 1) What did the inspector observe in the field? (Narrative description of field observations and how inspector performed) 2) Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices) 3) Other. Info Only = No Points	Info Only	Info Only
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Evaluator Notes:
Inspector conducted virtual inspection on operator integrity mgt and general field inspection at CenterPoints Waterville storage facility. No issues and inspection completed in Inspection Assistant

Total points scored for this section: 11
Total possible points for this section: 11



PART H - 60106 Agreement

Points(MAX) Score

1 Did the state use the current federal inspection form(s)? 1 NA
Yes = 1 No = 0 Needs Improvement = .5 Not Applicable = NA

Evaluator Notes:

2 Are results documented demonstrating inspection units were reviewed in accordance with state inspection plan? 1 NA
Yes = 1 No = 0 Needs Improvement = .5 Not Applicable = NA

Evaluator Notes:

3 Were any probable violations identified by state referred to PHMSA for compliance? 1 NA
Yes = 1 No = 0 Needs Improvement = .5 Not Applicable = NA

Evaluator Notes:

4 Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? 1 NA
Yes = 1 No = 0 Needs Improvement = .5 Not Applicable = NA

Evaluator Notes:

5 Did the state give written notice to PHMSA within 60 days of all probable violations found? 1 NA
Yes = 1 No = 0 Needs Improvement = .5 Not Applicable = NA

Evaluator Notes:

6 Did the state initially submit documentation to support compliance action by PHMSA on probable violations? 1 NA
Yes = 1 No = 0 Needs Improvement = .5 Not Applicable = NA

Evaluator Notes:

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

Evaluator Notes:

Not applicable

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

