Underground Natural Gas Storage - Rule and FAQs

1. Deviations from 192.12 Requirements What are the procedures for deviating from required provisions of the applicable API RPs? (UNGS.RULE.192DEVIAITIONS.P) 192.12(f)

2. Deviations from 192.12 Requirements Do records support any deviations from the required provisions of the applicable API RP? (UNGS.RULE.192DEVIAITIONS.R) 192.12(f)

3. Deviations from 192.12 Requirements - Retention What is the established record retention period for deviations? (UNGS.RULE.192DEVIAITIONSRETAIN.R) 192.12(f)

4. FAQ 22 - Safety Risk Analysis and Assessment What is the timeline for conducting and completing the safety risk analyses and risk assessments for each storage facility and all related wells? (UNGS.RULE.FAQ22TIMELINE.P) 192.12(d) (192.12(b))

5. FAQ 22 - Prioritization Based on Safety Risk Analysis Are risk assessments for each storage facility and related wells prioritized based on the results of the safety risk analyses? (UNGS.RULE.FAQ22PRIORITIES.P) 192.12(d) (192.12(b))

6. FAQ 22 - Addressing Safety Concerns Based on Safety Risk Analysis Ranking Are safety concerns addressed based on the ranking of the safety risk analyses? (UNGS.RULE.FAQ22RANKING.P) 192.12(d) (192.12(b))

7. FAQ 27 - Drug and Alcohol Testing Program Is there a Drug and Alcohol testing program in place that meets the requirements of 49 CFR Part 199? (UNGS.RULE.FAQ27DRUGTEST.P) 199.1
Underground Natural Gas Storage - Reporting

1. **Definition of Incident** How does the operator define an incident? (UNGS.RPT.INCIDENTDEFN.P) 191.15(c) (191.3)

2. **Incident Reporting - Immediate** Is there a process to immediately report incidents to the National Response Center? (UNGS.RPT.IMMEDREPORT.P) 191.5(a) (191.5(b), 191.3)

3. **Incident Reporting - Immediate** Do records indicate immediate notifications of incidents were made in accordance with 191.5? (UNGS.RPT.IMMEDREPORT.R) 191.5(a) (191.5(b);191.3)

4. **Incident Reporting - Procedures** What are the procedures in place for reporting a storage facility incident soon as practicable but no later than 30 days after discovery of a reportable incident? (UNGS.RPT.INCIDENTREPORT.P) 191.15(c) (191.3)

5. **Incident Reporting - Procedures** Do records indicate reportable incidents were identified and reports were submitted to DOT on Form 7100.2 within the required time frame? (UNGS.RPT.INCIDENTREPORT.R) 191.15(c) (191.3)

6. **Incident Reporting - Supplemental** What are the procedures in place for preparing and filing supplemental incident reports? (UNGS.RPT.INCIDENTREPORTSUPP.P) 191.15(d) (191.15(c))

7. **Incident Reporting - Supplemental** Do records indicate accurate supplemental incident reports were filed and within the required time frame? (UNGS.RPT.INCIDENTREPORTSUPP.R) 191.15(d) (191.15(c))

8. **Safety-Related Conditions Reporting (SRCR)** Are procedures in place to report a safety-related condition as required by 191.23? (UNGS.RPT.SRCR.P) 191.23(a) (191.25)

9. **Safety-Related Conditions Reporting (SRCR)** Have any Safety-Related Condition Reports been submitted to PHMSA/OPS? (UNGS.RPT.SRCR.R) 191.23(a) (191.25)
10. Annual Report  Does the process require submittal of an annual report (Form 7100.4-1) by March 15 for the preceding calendar year? (UNGS.RPT.ANNUALREPORT.P) 191.17(c)

11. Annual Report  Are annual reports retained? (UNGS.RPT.ANNUALREPORT.R) 191.17(c)

12. National Registry - OPID  Does the process require the obtaining, and appropriate control, of Operator Identification Numbers (OPIDs) for the storage field? (UNGS.RPT.OPID.P) 191.22(a) (191.22(b))

13. National Registry - Notification of Changes  What is the process in place to notify PHMSA of any changes that fall under 191.22(c) (i.e., construction, conversions, change in entity, or acquisition or divestiture)? (UNGS.RPT.REGISTRYCHGSNOTIF.P) 191.22(c)

14. National Registry - Notification of Changes  Are records retained for changes, per 191.22(c), that occur to the storage facility? (UNGS.RPT.REGISTRYCHGSNOTIF.R) 191.22(c)
Underground Natural Gas Storage - Reservoirs - Risk Management for Storage Operations

1. **Definition of Risk** How is “risk” defined in the Risk Management Program? (UNGS.RESRISK.DEFINITION.P) 192.12(d) (API RP1171 Section 8.1)

2. **Data Sources and Collection** Does the process require that information be collected and used to determine susceptibility to threats and hazard-related events? (UNGS.RESRISK.DATASOURCES.P) 192.12(d) (API RP1171 Section 8.3.2)

3. **Data Sources and Collection** Do records demonstrate that appropriate data was collected and used to determine susceptibility to threats and hazard-related events? (UNGS.RESRISK.DATASOURCES.R) 192.12(d) (API RP1171 Section 8.3.2)

4. **Evaluation of Threats and Hazards** Does the process require evaluation for potential threats and hazards impacting storage wells and reservoirs? (UNGS.RESRISK.THREATEVAL.P) 192.12(d) (API RP1171 Section 8.4.2)

5. **Evaluation of Threats and Hazards** Do records demonstrate that potential threats and hazards impacting storage wells and reservoir were adequately evaluated? (UNGS.RESRISK.THREATEVAL.R) 192.12(d) (API RP1171 Section 8.4.1)

6. **Threat and Hazard Interaction** Does the process require that information be collected and used to assess threat and hazard interaction? (UNGS.RESRISK.THREATINTERACT.P) 192.12(d) (API RP1171 Section 8.3.2)

7. **Threat and Hazard Interaction** Do records demonstrate that appropriate data is used to assess threat and hazard interaction? (UNGS.RESRISK.THREATINTERACT.R) 192.12(d) (API RP1171 Section 8.3.2)

8. **Exclusion of Threats and Hazards Events** Does the process include provisions for the exclusion of specific hazards or threats events and related threats interactions? (UNGS.RESRISK.THREATEXCLUDE.P) 192.12(d) (API RP1171 Section 8.4.1)

9. **Exclusion of Threats and Hazards Events** Do records demonstrate that the process was followed for the exclusion of specific hazards or threat events and related threats interactions? (UNGS.RESRISK.THREATEXCLUDE.R) 192.12(d) (API RP1171 Section 8.4.1)
10. Risk Assessment - Consistent Process Does the process assess risk in a consistent manner and with a consistent methodology? (UNGS.RESRISK.RISKASSESS.P) 192.12(d) (API RP1171 Section 8.5.2)

11. Risk Assessment - Consistent Process Do the records demonstrate that the risk assessment was done in a consistent manner and with a consistent methodology? (UNGS.RESRISK.RISKASSESS.R) 192.12(d) (API RP1171 Section 8.5.2)

12. Risk Assessment - Results Review Does the process require review of the risk assessment results to determine whether the risk assessment, resulting prioritization, or ranking accurately represents its facilities and the characterization of the risks? (UNGS.RESRISK.RISKASSESSRESULT.P) 192.12(d) (API RP1171 Section 8.5.2)

13. Risk Assessment - Results Review Do the records demonstrate that the results of the risk assessment were reviewed to determine whether the risk assessment, resulting prioritization, or ranking accurately represents its facilities and the characterization of the risks? (UNGS.RESRISK.RISKASSESSRESULT.R) 192.12(d) (API RP1171 Section 8.5.2)

14. Preventive and Mitigative Measures Does the process require identification and implementation of preventive and mitigative measures to manage risks? (UNGS.RESRISK.PREVMITIGMETHOD.P) 192.12(d) (API RP1171 Section 8.6.2)

15. Preventive and Mitigative Measures Do records demonstrate how the preventative and mitigative measures were identified and implemented to reduce risk? (UNGS.RESRISK.PREVMITIGMETHOD.R) 192.12(d) (API RP1171 Section 8.6.2)

16. Risk Reassessment and Periodic Review Does the process maintain a continual risk management review and improvement cycle? (UNGS.RESRISK.REASSESSRVW.P) 192.12(d) (API RP1171 Section 8.7.1)

17. Risk Reassessment and Periodic Review Do records demonstrate that a continual risk management review and improvement cycle is performed? (UNGS.RESRISK.REASSESSRVW.R) 192.12(d) (API RP1171 Section 8.7.1)

18. Risk Management Effectiveness Review Does the process require assessment of the effectiveness of risk monitoring and risk management programs? (UNGS.RESRISK.RISKMGMTEFFECTIVE.P) 192.12(d) (API RP1171 Section 8.7.1)
19. **Risk Management Effectiveness Review** Do records demonstrate how the effectiveness of the risk monitoring and risk management is assessed? (UNG.S.RESRISK.RISKMGMT.EFFECTIVE.R) 192.12(d) (API RP1171 Section 8.7.1)

20. **Risk Assessment Review & Update Frequency** Does the process require a periodic risk assessment review and updating, and is it on a defined frequency? (UNG.S.RESRISK.RISKASSESSFREQ.P) 192.12(d) (API RP1171 Section 8.7.2)

21. **Risk Assessment Review & Update Frequency** Do records demonstrate that the operator performed a risk assessment review and update and that it was performed in accordance with a defined frequency? (UNG.S.RESRISK.RISKASSESSFREQ.R) 192.12(d) (API RP1171 Section 8.7.2)

22. **Identifying New Threats and Hazards** If new threats or hazards are identified, or the impact of threats or hazards changes markedly, does the process assess the risk associated with the new conditions and evaluate and prioritize risk management options in accordance with the risk assessment? (UNG.S.RESRISK.NEWTHREATS.P) 192.12(d) (API RP1171 Section 8.7.3)

23. **Identifying New Threats and Hazards** Do the records detail the identification of new threats or hazards and how they were evaluated and prioritized in the risk assessment as a result? (UNG.S.RESRISK.NEWTHREATS.R) 192.12(d) (API RP1171 Section 8.7.3)

24. **Risk Management Records Retention** Does the process include a risk management records management plan and a records retention schedule? (UNG.S.RESRISK.RISKRECORDS.P) 192.12(d) (API RP1171 Section 8.8)

25. **Risk Management Records Retention** Do records demonstrate that the retention schedule and the records management plan were satisfied? (UNG.S.RESRISK.RISKRECORDS.R) 192.12(d) (API RP1171 Section 8.8)
Underground Natural Gas Storage - Reservoirs - Integrity Monitoring

1. **Integrity Maintenance - Reservoirs** Do the processes and procedures ensure the ongoing functional integrity of reservoirs in accordance with API RP1171, Sections 9.2 and 11.2.1? (UNGS.RESINTEG.INTEGRESERVOIRS.P) 192.12(d) (API RP1171 Section 9.2.1)

2. **Integrity Maintenance - Reservoirs** Do the records demonstrate that integrity demonstration, integrity verification and monitoring practices are used to maintain ongoing functional integrity of the reservoir(s)? (UNGS.RESINTEG.INTEGRESERVOIRS.R) 192.12(d) (API RP1171 Section 9.2.1)

3. **Integrity Maintenance - Overall** Are there any integrity maintenance activities (i.e. O&M work, well workovers, well-logging, or any integrity verification or monitoring activities) that can be observed during the inspection? (UNGS.RESINTEG.INTEGOVERALL.O) 192.12(d) (API RP1171 Section 9.2.1)

4. **Integrity Maintenance - Site Specific** Do the integrity processes and procedures account for site specific characteristics of the reservoir and wells (API RP1171, Section 9.2.1)? (UNGS.RESINTEG.INEGSITESPEC.P) 192.12(d) (API RP1171 Section 9.2.1)

5. **Integrity Maintenance - Site Specific** Do records demonstrate that integrity-related site-specific characteristics of the reservoir and wells have been accounted for? (UNGS.RESINTEG.INEGSITESPEC.R) 192.12(d) (API RP1171 Section 9.2.1)

6. **Risk-Based Evaluation** Does the process use a risk-based approach for developing the integrity demonstration, verification, and monitoring tasks? (UNGS.RESINTEG.RISKBASEDEVAL.P) 192.12(d) (API RP1171 Section 9.2.2)

7. **Risk-Based Evaluation** Do records demonstrate that a risk-based approach was used as the basis for developing the integrity demonstration, verification, and monitoring tasks? (UNGS.RESINTEG.RISKBASEDEVAL.R) 192.12(d) (API RP1171 Section 9.2.2)

8. **Risk-Based Integrity Activities Frequency** Does the process use risk assessments to determine the frequency requirements for integrity demonstration, verification, and monitoring tasks or activities? (UNGS.RESINTEG.RISKBASEDFREQ.P) 192.12(d) (API RP1171 Section 9.2.2)
9. Risk-Based Integrity Activities Frequency  Do records demonstrate that risk assessments were used to determine the frequency requirements for integrity demonstration, verification and monitoring tasks?
(UNGS.RESINTEG.RISKBASEDFREQ.R) 192.12(d) (API RP1171 Section 9.2.2)

10. Well Integrity Evaluation  Does the process describe how the mechanical integrity of each well that penetrates the storage reservoir and buffer zone or areas influenced by storage operations, including third-party wells, is evaluated?
(UNGS.RESINTEG.WELLINTEGRATION.P) 192.12(d) (API RP1171 Section 9.3.1)

11. Well Integrity Evaluation  Do records demonstrate the process of evaluating the mechanical integrity of each well that penetrates the storage reservoir and buffer zone or areas influenced by storage operations, including third party wells?
(UNGS.RESINTEG.WELLINTEGRATION.R) 192.12(d) (API RP1171 Section 9.3.1)

12. Third-Party Well Integrity Data  Does the process detail how, and how frequently, to request well integrity evaluation data from third-party well owner/operators?
(UNGS.RESINTEG.THIRDPARTYWELLS.P) 192.12(d) (API RP1171 Section 9.3.1)

13. Third-Party Well Integrity Data  Do the records demonstrate that well integrity evaluation data from third party well owner/operators were requested, and evaluated, according to the established frequency?
(UNGS.RESINTEG.THIRDPARTYWELLS.R) 192.12(d) (API RP1171 Section 9.3.1)

14. Well Integrity Evaluation Integration into Risk Program  How does the process integrate the well integrity evaluations into the risk management program?
(UNGS.RESINTEG.WELLINTEGRATION.P) 192.12(d) (API RP1171 Section 9.3.1)

15. Well Integrity Evaluation Integration into Risk Program  Do records demonstrate that active well mechanical integrity evaluations included initial and subsequent evaluations as determined using the risk assessment and the information derived from the initial evaluation?
(UNGS.RESINTEG.WELLINTEGRATION.R) 192.12(d) (API RP1171 Section 9.3.1)

16. Well Integrity - Monitoring for Annular Gas  Do the procedures require monitoring for the presence of annular gas by measuring and recording annular pressure and/or annular gas flow on a regular basis?
(UNGS.RESINTEG.WELLANNULAR.P) 192.12(d) (API RP1171 Section 9.3.2)
17. Well Integrity - Monitoring for Annular Gas Do records demonstrate that the presence of annular gas is monitored according to procedure? (UNGS.RESINTEG.WELLANNULAR.R) 192.12(d) (API RP1171 Section 9.3.2)

18. Well Integrity - Annular Gas Threshold/Limit Do the procedures define a threshold or limit for the annular pressure and/or annular gas flow? (UNGS.RESINTEG.WELLANNULARLIMIT.P) 192.12(d) (API RP1171 Section 9.3.2)

19. Well Integrity - Annular Gas Threshold/Limit Do records demonstrate that the set threshold or limit for pressure monitoring was not exceeded? (UNGS.RESINTEG.WELLANNULARLIMIT.R) 192.12(d) (API RP1171 Section 9.3.2)

20. Well Integrity - Annular Gas Threshold/Limit Exceeded Does the process require that each annular gas occurrence that exceeds operator-defined or regulatory-defined threshold levels be evaluated? (UNGS.RESINTEG.WELLANNULAREXCEEDED.P) 192.12(d) (API RP1171 Section 9.3.2)

21. Well Integrity - Annular Gas Threshold/Limit Exceeded Do the records demonstrate that each annular gas occurrence that exceeded operator-defined or regulatory-defined threshold levels was evaluated according to the procedure? (UNGS.RESINTEG.WELLANNULAREXCEEDED.R) 192.12(d) (API RP1171 Section 9.3.2)

22. Well Integrity - Wellhead Visual Inspection Does the process require the visual inspection of each wellhead assembly for leaks at least annually? (UNGS.RESINTEG.WELLVISUALINSPECT.P) 192.12(d) (API RP1171 Section 9.3.2)

23. Well Integrity - Wellhead Visual Inspection Do the records demonstrate that visual inspections of each wellhead assembly for leaks were conducted in accordance with the procedures? (UNGS.RESINTEG.WELLVISUALINSPECT.R) 192.12(d) (API RP1171 Section 9.3.2)

24. Well Integrity - Wellhead Visual Inspection Do field observations confirm that wellhead assembly was visually inspected for leaks? (UNGS.RESINTEG.WELLVISUALINSPECT.O) 192.12(d) (API RP1171 Section 9.3.2)

25. Well Integrity - Wellhead Valve Testing Does the procedure describe how to annually test the operation of the master valve and wellhead pipeline isolation valve for proper function and ability to isolate the well? (UNGS.RESINTEG.WELLHEADVALVETEST.P) 192.12(d) (API RP1171 Section 9.3.2)
26. Well Integrity - Wellhead Valve Testing Do records demonstrate that the operation of the master valve and wellhead pipeline isolation valve for proper function and ability to isolate the well is being tested according to procedure? (UNGS.RESINTEG.WELLHEADVALVETEST.R) 192.12(d) (API RP1171 Section 9.3.2)

27. Well Integrity - Wellhead Valve Maintenance Do the processes and procedures describe the valve maintenance program for maintaining, repairing, and replacing isolation valves? (UNGS.RESINTEG.WELLHEADVALVEMaint.P) 192.12(d) (API RP1171 Section 9.3.2)

28. Well Integrity - Wellhead Valve Maintenance Do records demonstrate that valves are maintained, repaired, or replaced in accordance with the valve maintenance program for isolation valves? (UNGS.RESINTEG.WELLHEADVALVEMaint.R) 192.12(d) (API RP1171 Section 9.3.2)

29. Well Integrity - Subsurface Safety Valve Testing Do procedures explain how surface and subsurface safety valve systems, where installed, are annually function-tested in accordance with manufacturer’s specifications and the operator’s procedures? (UNGS.RESINTEG.WELLSsSVTEST.P) 192.12(d) (API RP1171 Section 9.3.2)

30. Well Integrity - Subsurface Safety Valve Testing Do records demonstrate that surface and subsurface safety valve systems, where installed, are function-tested at least annually and according to procedure? (UNGS.RESINTEG.WELLSsSVTEST.R) 192.12(d) (API RP1171 Section 9.3.2)

31. Well Integrity - Closed Well Safety Valve Do the procedures for a closed storage well safety valve require that it must be manually reopened at the site and not done so remotely? (UNGS.RESINTEG.CLOSEDSAFETYVALVE.P) 192.12(d) (API RP1171 Section 9.3.2)

32. Well Integrity - Closed Well Safety Valve Do records demonstrate that a closed storage well safety valve was manually reopened and not done so remotely? (UNGS.RESINTEG.CLOSEDSAFETYVALVE.R) 192.12(d) (API RP1171 Section 9.3.2)

33. Well Integrity - All Observations Were observed well integrity activities performed adequately and in accordance with established processes? (Reference API RP1171, Section 9) (UNGS.RESINTEG.WELLINTEGRITY.O) 192.12(d) (API RP1171 Section 9)

34. Well Integrity - Recordkeeping Do the procedures require that all integrity-related inspections, tests, patrols and analyses be documented? (UNGS.RESINTEG.RECORDS.P) 192.12(d) (API RP1171 Section 9.8.1)
35. **Well Integrity - Recordkeeping** Do records demonstrate that all integrity-related inspections, tests, patrols, and analyses are documented according to procedure? (UNGS.RESINTEG.RECORDS.R) 192.12(d) (API RP1171 Section 9.8.1)

36. **Well Integrity - Record Retention** Do the process and procedures require that the retention period for storage inventory assessments be the “life of the facility”? (UNGS.RESINTEG.RECORDRETAIN.P) 192.12(d) (API RP1171 Section 9.8.2; API RP1171 Section 9.5)

37. **Well Integrity - Record Retention** Do records demonstrate that storage inventory assessments are being retained for the life of the facility? (UNGS.RESINTEG.RECORDRETAIN.R) 192.12(d) (API RP1171 Section 9.8.2)
Underground Natural Gas Storage - Reservoirs - Site Security & Safety

1. **Site Security and Safety - Measures** Is there a process or procedure that describes what security and safety measures are required for each well site? (UNGS.RESSITE.SECURITY.P) 192.12(d) (API RP1171 Section 10.2.2; API RP1171 Section 10.1; API RP1171 Section 11.9.1)

2. **Site Security and Safety - Fences** Do processes describe how fences or enclosures at well sites comply with applicable fire codes and regulations, where applicable? (UNGS.RESSITE.FENCES.P) 192.12(d) (API RP1171 Section 10.3.2)

3. **Site Security and Safety - Fences** Do records demonstrate compliance with applicable fire codes and regulations for control of site ingress and egress, where applicable? (UNGS.RESSITE.FENCES.R) 192.12(d) (API RP1171 Section 10.3.2)

4. **Site Security and Safety - Fences** Are well location areas secure (which may include fences or enclosures, barriers, chains on valves, locks on fence gate, security cameras, etc.), and do fences or enclosures comply with applicable fire codes and regulations? (UNGS.RESSITE.FENCES.O) 192.12(d) (API RP1171 Section 10.3.2; API RP1171 Section 11.9.1)

5. **Signage** Does the process require that there is permanent weatherproof signage installed at each well site? (UNGS.RESSITE.SIGNAGE.P) 192.12(d) (API RP1171 Section 10.4.1)

6. **Signage** Do records demonstrate that there is a sign at each well site? (UNGS.RESSITE.SIGNAGE.R) 192.12(d) (API RP1171 Section 10.4.1)

7. **Signage** Is a permanent weatherproof signage installed at each well site? (UNGS.RESSITE.SIGNAGE.O) 192.12(d) (API RP1171 Section 10.4.1)

8. **Emergency Preparedness/Response Plan** Does the emergency preparedness / emergency response plan address accidental releases, equipment failure, natural disasters, and third-party emergencies? (UNGS.RESSITE.EMERGPLAN.P) 192.12(d) (API RP1171 Section 10.6.1)
9. Emergency Preparedness/Response Plan  Do records demonstrate that the emergency preparedness/response plan addresses accidental releases, equipment failure, natural disasters, and third-party emergencies? (UNGS.RESSITE.EMERGPLAN.R) 192.12(d) (API RP1171 Section 10.6.1)

10. Emergency Preparedness/Response Plan - Effectiveness  Does the process require review/evaluation of the emergency preparedness/response plan for effectiveness on a defined frequency? (UNGS.RESSITE.EMERGPLANEFF.P) 192.12(d) (API RP1171 Section 11.4.2; API RP1171 Section 10.6.1)

11. Emergency Preparedness/Response Plan - Effectiveness  Do records demonstrate that the emergency preparedness/response plan was evaluated for effectiveness and within the defined frequency? (UNGS.RESSITE.EMERGPLANEFF.R) 192.12(d) (API RP1171 Section 11.4.2; API RP1171 Section 10.6.1)

12. Emergency Preparedness/Response Plan - All  Is an observed emergency preparedness drill or tabletop exercise conducted adequately and in accordance with the established plan? (UNGS.RESSITE.EMERGPLAN.O) 192.12(d) (API RP1171 Section 10.6.1; API RP1171 Section 11.4.2)

13. Emergency Preparedness/Response Plan - Training  Does the process require training for storage operations and applicable staff in the use of the emergency preparedness/response plan? (UNGS.RESSITE.ERTRAINING.P) 192.12(d) (API RP1171 Section 11.4.2; API RP1171 Section 10.6.2)

14. Emergency Preparedness/Response Plan - Training  Do records demonstrate that storage facility staff were trained in the use of the emergency preparedness/response plan? (UNGS.RESSITE.ERTRAINING.R) 192.12(d) (API RP1171 Section 11.4.2; API RP1171 Section 10.6.2)

15. Emergency Preparedness/Response Plan - Training  Was emergency preparedness/response plan training conducted adequately and in accordance with the established process? (UNGS.RESSITE.ERTRAINING.O) 192.12(d) (API RP1171 Section 11.4.2; API RP1171 Section 10.6.2)

16. Blowout Contingency Plan  Is there a current Blowout Contingency Plan in place? (UNGS.RESSITE.BLOWOUTPLAN.P) 192.12(d) (API RP1171 Section 10.6.3)

17. Blowout Contingency Plan  Do records demonstrate that the Blowout Contingency Plan was followed according to procedure? (UNGS.RESSITE.BLOWOUTPLAN.R) 192.12(d) (API RP1171 Section 10.6.3)
18. Blowout Contingency Plan - Review Does the process define a frequency for review and updating of the Blowout Contingency Plan? (UNGS.RESSITE.BLOWOUTPLANRVW.P) 192.12(d) (API RP1171 Section 10.6.3; API RP1171 Section 11.4.2)

19. Blowout Contingency Plan - Review Do records demonstrate that the Blowout Contingency Plan review was implemented/conducted? (UNGS.RESSITE.BLOWOUTPLANRVW.R) 192.12(d) (API RP1171 Section 10.6.3; API RP1171 Section 11.4.2)

20. Blowout Contingency Plan - Observations Was the Blowout Contingency Plan followed during drills and tabletop exercises? (UNGS.RESSITE.BLOWOUTPLAN.O) 192.12(d) (API RP1171 Section 10.6.3)
Underground Natural Gas Storage - Reservoirs - Procedures & Training

1. **Construction, Operation, and Maintenance Procedures** Are there procedures in place for the construction, operation, and maintenance of natural gas storage wells and reservoirs used to establish and maintain functional integrity? (UNGS.RESPROCED.CONSTROPSMAINT.P) 192.12(d) (API RP1171 Section 11.2.1; API RP1171 Section 11.2.2)

2. **Construction, Operation, and Maintenance Procedures** Are construction, operation, and maintenance records retained, as required, for both the operator and vendors? (UNGS.RESPROCED.CONSTROPSMAINT.R) 192.12(d) (API RP1171 Section 11.2.1; API RP1171 Section 11.2.2)

3. **Construction, Operation, and Maintenance Procedures - In Place** Do records demonstrate that the Construction, Operation, and Maintenance procedures were in place prior to the development of a new storage facility? (UNGS.RESPROCED.CONSTROPSMAINT2.R) 192.12(d) (API RP1171 Section 11.2.1)

4. **Construction, Operation, and Maintenance Procedures** Are current procedures available and readily accessible to operations, maintenance, and storage personnel? (UNGS.RESPROCED.CONSTROPSMAINT.O) 192.12(d) (API RP1171 Section 11.2.1)

5. **Operations and Maintenance Procedures - Implementation** Do records demonstrate O&M procedures covering storage wells and reservoirs were developed and implemented prior to the commissioning operations? (UNGS.RESPROCED.OPSMAINTIMPL.R) 192.12(d) (API RP1171 Section 11.3.1)

6. **Operations and Maintenance Procedures - Coverage** Do records demonstrate O&M procedures covering storage wells and reservoirs includes all work activities performed by contractors/vendors and the operator’s personnel? (UNGS.RESPROCED.OPSMAINTSCOPE.R) 192.12(d) (API RP1171 Section 11.3.2; API RP1171 Section 11.3.1)

7. **Control Room - Interactions and Communications** Does the process or procedure describe the interaction and communication between operations & maintenance personnel and the control room for maintaining reservoir and well functional integrity during normal, abnormal, and emergency conditions? (UNGS.RESPROCED.CONTROLROOM.P) 192.12(d) (API RP1171 Section 11.7.1)

8. **Control Room - Interactions and Communications** Do records demonstrate that there are communications between operations & maintenance personnel and the control room for maintaining reservoir and well functional integrity during normal, abnormal, and emergency conditions? (UNGS.RESPROCED.CONTROLROOM.R) 192.12(d) (API RP1171 Section 11.7.1)
9. Safety and Environmental Programs - Safeguards Do the process and procedures incorporate safeguards for the Environment, Safety, and Health into storage design, construction, and operations? (UNGS.RESPROCED.SFTYENVPROGENV.P) 192.12(d) (API RP1171 Section 11.9.1)

10. Safety and Environmental Programs - Safeguards Do records demonstrate that safeguards for the Environment, Safety, and Health are incorporated into storage design, construction, and operations? (UNGS.RESPROCED.SFTYENVPROGENV.R) 192.12(d) (API RP1171 Section 11.9.1)

11. Safety and Environmental Programs - Site Security Do the process and procedures incorporate safeguards for Site Security into storage design, construction, and operations? (UNGS.RESPROCED.SFTYENVPROGSECUR.P) 192.12(d) (API RP1171 Section 11.9.1)

12. Safety and Environmental Programs - Site Security Do records demonstrate that safeguards for Site Security are incorporated into storage design, construction, and operations? (UNGS.RESPROCED.SFTYENVPROGSECUR.R) 192.12(d) (API RP1171 Section 11.9.1)

13. Management of Change Do the process or procedures require that changes are accomplished in a controlled manner (use of a Management of Change process)? (UNGS.RESPROCED.MOC.P) 192.12(d) (API RP1171 Section 11.11.1)

14. Management of Change Do records demonstrate that changes are made in a controlled manner (and in accordance with the MOC or equivalent process)? (UNGS.RESPROCED.MOC.R) 192.12(d) (API RP1171 Section 11.11.1)

15. Management of Change - Program Revisions Does the process require that program documentation, framework, and procedures are revised before the change is implemented? (UNGS.RESPROCED.MOCREVISE.P) 192.12(d) (API RP1171 Section 11.11.1)

16. Management of Change - Program Revisions Do records demonstrate that the program documentation, framework and procedures were revised before the change was implemented? (UNGS.RESPROCED.MOCREVISE.R) 192.12(d) (API RP1171 Section 11.11.1)

17. Training of O&M Personnel - Notify Changes Does the process require that operating personnel be notified of changes whenever changes are made to the operating procedures specified in API RP1171, Section 11.3? (UNGS.RESPROCED.TRAINOM.P) 192.12(d) (API RP1171 Section 11.12.2)
18. Training of O&M Personnel - Notify Changes Do records detail how the MOC process for the notification of changes to the operating procedures was followed? (UNGS.RESPROCED.TRAINOM.R) 192.12(d) (API RP1171 Section 11.12.2)

19. Training of O&M Personnel - Change Related Training Does the process require that the operating personnel be trained, and the training documented, whenever changes are made to the operating procedures specified in API RP1171, Section 11.3? (UNGS.RESPROCED.TRAINOMCHGS.P) 192.12(d) (API RP1171 Section 11.12.2; API RP1171 Section 11.3)

20. Training of O&M Personnel - Change Related Training Do records demonstrate that operating personnel were trained when an applicable change was made to the operating procedures? (UNGS.RESPROCED.TRAINOMCHGS.R) 192.12(d) (API RP1171 Section 11.12.2; API RP1171 Section 11.3)

21. Training Records - Retention What is the established retention interval for training records? (UNGS.RESPROCED.TRAINRECORDS.P) 192.12(d) (API RP1171 Section 11.13.2; API RP1171 Section 11.13.3)

22. Training Records - Retention Do records demonstrate that training records retention meets the operator established interval? (UNGS.RESPROCED.TRAINRECORDS.R) 192.12(d) (API RP1171 Section 11.13.2; API RP1171 Section 11.13.3)

23. Records and Documentation Does the process include a list of the necessary documents that need to be recorded for compliance with procedures as required in API RP1171, Section 11? (UNGS.RESPROCED.RECORDSDOC.P) 192.12(d) (API RP1171 Section 11.13.1)

24. Records Retention Does the process establish a retention interval for all records that satisfy API RP1171, Section 11 requirements and operator requirements? (UNGS.RESPROCED.RETENTION.P) 192.12(d) (API RP1171 Section 11.13.3)

25. Records Retention Do records demonstrate that the records retention intervals are followed for the API RP1171 Section 11 requirements and operator requirements? (UNGS.RESPROCED.RETENTION.R) 192.12(d) (API RP1171 Section 11.13.3)