



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

1200 New Jersey Avenue SE  
Washington DC 20590

# 2010 Natural Gas State Program Evaluation

for

Oklahoma Corporation Commission

## Document Legend

### PART:

- O -- Representative Date and Title Information
- A -- General Program Qualifications
- B -- Inspections and Compliance - Procedures/Records/Performance
- C -- Interstate Agent States
- D -- Incident Investigations
- E -- Damage Prevention Initiatives
- F -- Field Inspection
- G -- PHMSA Initiatives - Strategic Plan
- H -- Miscellaneous
- I -- Program Initiatives



2010 Natural Gas State Program Evaluation -- CY 2010  
Natural Gas

**State Agency:** Oklahoma

**Agency Status:**

**Date of Visit:** 07/18/2011 - 07/22/2011

**Agency Representative:** Dennis Fothergill, Pipeline Safety Manager

**PHMSA Representative:** Patrick Gaume

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

**Name/Title:** Ms. Dana Murphy, Chairman

**Agency:** Oklahoma Corporation Commission

**Address:** 2101 N. Lincoln Blvd.

**City/State/Zip:** Oklahoma City, Oklahoma 73105

**Rating:**

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

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**INSTRUCTIONS:**

Complete this evaluation in accordance with the Procedures for Evaluating State Pipeline Safety Program. The evaluation should generally reflect state program performance during CY 2010 (not the status of performance at the time of the evaluation). All items for which criteria have not been established should be answered based on the PHMSA representative's judgment. 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 space provided for general comments/regional observations. If a question is not applicable to a state, select NA. Please ensure all responses are COMPLETE and ACCURATE, and OBJECTIVELY reflect state program performance. Increasing emphasis is being placed on performance. This evaluation together with selected factors reported in the state's annual certification/agreement attachments provide the basis for determining the state's pipeline safety grant allocation.

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**Field Inspection (PART F):**

The field inspection form used will allow different areas of emphasis to be considered for each question. Question 13 is provided for scoring field observation areas. In completing PART F, the PHMSA representative should include a written summary which thoroughly documents the inspection.

**Scoring Summary**

**PARTS**

**Possible Points    Points Scored**

A	General Program Qualifications	26	26
B	Inspections and Compliance - Procedures/Records/Performance	24	24
C	Interstate Agent States	0	0
D	Incident Investigations	7	7
E	Damage Prevention Initiatives	9	9
F	Field Inspection	12	12
G	PHMSA Initiatives - Strategic Plan	9.5	9
H	Miscellaneous	3	3
I	Program Initiatives	9	9

**99.5                      99**

**TOTALS**

**State Rating ..... 99.5**

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## PART A - General Program Qualifications

Points(MAX) Score

- |          |  |                                     |   |
|----------|--|-------------------------------------|---|
| <b>1</b> | Did the state submit complete and accurate information on the attachments to its most current 60105(a) Certification/60106 (a) Agreement? (NOTE: PHMSA Representative to verify certification/agreement attachments by reviewing appropriate state documentation. Score a deficiency in any one area as "needs improvement". Attachment numbers appear in parenthesis) Previous Question A.1, Items a-h worth 1 point each<br>Yes = 8 No = 0 Needs Minor Improvement = 3-7 Needs Major Improvement = 2 | 8                                   | 8 |
| <hr/>    |  |                                     |   |
| a.       | State Jurisdiction and agent status over gas facilities (1)  | <input checked="" type="checkbox"/> |   |
| b.       | Total state inspection activity (2)  | <input checked="" type="checkbox"/> |   |
| c.       | Gas facilities subject to state safety jurisdiction (3)  | <input checked="" type="checkbox"/> |   |
| d.       | Gas pipeline incidents (4)   | <input checked="" type="checkbox"/> |   |
| e.       | State compliance actions (5)   | <input checked="" type="checkbox"/> |   |
| f.       | State record maintenance and reporting (6)   | <input checked="" type="checkbox"/> |   |
| g.       | State employees directly involved in the gas pipeline safety program (7)   | <input checked="" type="checkbox"/> |   |
| h.       | State compliance with Federal requirements (8)   | <input checked="" type="checkbox"/> |   |

### SLR Notes:

A.1 YES. 8 of 8 points. A--- yes, B---OK inspects not by Operator, but by Unit &/or System. A Unit can have between one and forty-two Systems. The Unit is where the records are kept. A System is a geographical group of pipe or distribution lines that is a sub-part of the Unit. State policy is to inspect every System every 2-5 years. As a practical matter, a Unit may be visited every year as a result of various Systems in the Unit being inspected. C----the Operator IDs are missing on Attachment 3, Warning only as OPID is not specified as required in Guidelines 2.5.3. Note for Carrie Winslow: The opid are present in the DRAFT of Attachment 3, but are absent in the FINAL printed version. Please change FedStar. D---Yes. E---Yes; In 2010 NOAs were considered but not adopted as a practice, (it is in the scope of the regulations but not used). Since 1987, the Policy has been that the only tool available is notices of non-compliance. F---Records are kept by paper records, in-house electronic records, and or FedStar. G---Yes. H---Yes.

- |          |   |   |   |
|----------|---|---|---|
| <b>2</b> | Did the state have an adequate mechanism to receive operator reporting of incidents to ensure state compliance with 60105(a) Certification/60106(a) Agreement requirements (fatality, injury requiring hospitalization, property damage exceeding \$50,000 - Mechanism should include receiving "after hours" reports)? (Chapter 6) Previous Question A.2<br>Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

### SLR Notes:

A.2. Yes. OCC meets the Federal reporting requirements, & requires reporting at \$5000 loss.

- |          |   |   |   |
|----------|---|---|---|
| <b>3</b> | Has the state held a pipeline safety TQ seminar(s) in the last 3 years? (NOTE: Indicate date of last seminar or if state requested seminar, but T&Q could not provide, indicate date of state request for seminar. Seminars must be held at least once every 3 calendar years.) (Chapter 8.5) Previous Question A.4<br>Yes = 2 No = 0 | 2 | 2 |
|----------|---|---|---|

### SLR Notes:

A.3. Yes, in Nov 6-9, 2007, & in May 12-15, 2009, scheduled for Nov 14-18, 2011. Practice is to schedule every 18 months or so.

- |          |  |   |   |
|----------|--|---|---|
| <b>4</b> | Were pipeline safety program files well-organized and accessible?(NOTE: This also includes electronic files) (Chapter 5) Previous Question A.5<br>Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

### SLR Notes:

A.4. Yes, the paper files are in the Pipeline Section Office area.

- |          |   |   |   |
|----------|---|---|---|
| <b>5</b> | Did state records and discussions with the state pipeline safety program manager indicate adequate knowledge of PHMSA program and regulations? (Chapter 4.1, Chapter 8.1) Previous Question A.6<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

### SLR Notes:

A.5. Yes, The Program Managers show a professional knowledge of the regulations.

- |          |   |   |   |
|----------|---|---|---|
| <b>6</b> | Did the state respond in writing within 60 days to the requested items in the Chairman's letter following the Region's last program evaluation? (No response is necessary if no items are requested in letter and mark "Yes") (Chapter 8.1) Previous Question A.8<br>Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

### SLR Notes:

A.6. Yes, The Chairman letter was sent within 7 days of receipt. It addressed State Damage Prevention Statutes, Staffing concerns, Incident and accident reporting, and Effectiveness of State's Damage Prevention Efforts.

- 7 What actions, if necessary, did the State initiate as a result of issues raised in the Chairperson's letter from the previous year? Did actions correct or address deficiencies from previous year's evaluation? (No response is necessary if no items are requested in letter and mark "Yes") (Chapter 8.1) Previous Question A.8/A.9 1 1  
Yes = 1 No = 0

SLR Notes:

A.7. Mostly, 1 pt. Civil penalties for excavation damage did not become law but efforts are continuing in this area. Hired two new employees in 4th qtr 2010. A job posting is current effective 7/7/11. When the posting is filled, then staffing will be at 100%. One additional position has been requested and approved; it will be posted in 1st qtr, 2012. Revised procedures have been implemented to minimize the under-reporting of incidents or accidents. The OCC is working with Oklahoma One-Call to improve data gathering for the purpose of measuring the effectiveness of operator's Damage Prevention Programs.

## Personnel and Qualifications

- 8 Has each inspector fulfilled the 3 year TQ training requirement? If No, has the state been granted a waiver regarding TQ courses by the Associate Administrator for Pipeline Safety? (NOTE: If the State has new inspectors who have not attended all TQ courses, but are in a program which will achieve the completion of all applicable courses within 3 years of taking first course (5 years to successfully complete), or if a waiver has been granted by the applicable Region Director for the state, please answer yes.) (Chapter 4.4) Previous Question A.10 3 3  
Yes = 3 No = 0

SLR Notes:

A.8. Yes, all inspectors with 3+ years of service have passed all TSI core courses, and the new inspectors are taking courses and are scheduled for the rest.

- 9 Brief Description of Non-TQ training Activities: Info Only Info Only  
Info Only = No Points

For State Personnel:

A.9. State- All Inspectors are HAZWOPER certified.

For Operators:

Operators ? 5 days per year, each inspector is required to provide training in the regulations to the operators. OCC is emphasizing the training of Master Meter Operators and Municipal Distribution. Have a program to strongly encourage/force distribution companies to assume operations & maintenance of customer owned sales/fuel lines. To date about 90% of the sales lines are O&M by the LDC. 38.5 days of on-site training was provided in 2010.

For Non-Operator Entities/Parties, Information Dissemination, Public Meetings:

Non-operator/public - nothing beyond enforcing RP 1162 to cause Operators to interface with the public.

SLR Notes:

A.9. State- All Inspectors are HAZWOPER certified.

Operators ? 5 days per year, each inspector is required to provide training in the regulations to the operators. OCC is emphasizing the training of Master Meter Operators and Municipal Distribution. Have a program to strongly encourage/force distribution companies to assume operations & maintenance of customer owned sales/fuel lines. To date about 90% of the sales lines are O&M by the LDC. 38.5 days of on-site training was provided in 2010.

Non-operator/public - nothing beyond enforcing RP 1162 to cause Operators to interface with the public.

- 10 Did the lead inspectors complete all required T&Q OQ courses and Computer Based Training (CBT) before conducting OQ Inspections? (Chapter 4.4.1) Previous Question A.12 1 1  
Yes = 1 No = 0

SLR Notes:

A.10. Yes. John Harper ('04) & Kelly Phelps ('05) are the OQ Leads, They were trained to TSI course 299 in 04 & 05. The other inspectors with 3+ years have also been trained.

- 11 Did the lead inspectors complete all required TQ Integrity Management (IMP) Courses/Seminars and CBT before conducting IMP Inspections? (Chapter 4.4.1) Previous Question A.13 1 1  
Yes = 1 No = 0

SLR Notes:

A.11. Yes. IMP Leads are John Harper ('05 & '04) & Kelly Phelps ('05 & '02). They were trained in 2005 for TSI course 297 and in 2004 or 2002 for TSI course 294.

- 12 Was the ratio acceptable of Total inspection Person-days to Total Person-days charged to the program by state inspectors? (Region Director may modify points for just cause) (Chapter 4.3) Previous Question B.12 5 5  
Yes = 5 No = 0

A. Total Inspection Person Days (Attachment 2):

947.50

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):

220 X 7.05 = 1551.73

Ratio: A / B

$947.50 / 1551.73 = 0.61$

If Ratio  $\geq 0.38$  Then Points = 5, If Ratio  $< 0.38$  Then Points = 0

Points = 5

**SLR Notes:**

A.12 A=947.5 person days. B=7.05 man years \* 220 = 1551 person days. A/B= .6109 . .61>.38, okay.

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- 13** Have there been modifications or proposed changes to inspector-staffing levels? (If yes, describe) Previous Info Only Info Only  
Question B.13

Info Only = No Points

**SLR Notes:**

A.13. Yes, staffing levels were down during 2008-2010 and were restored at the end of 2010. Staffing was at 13 through 2007. In November, 2007, an inspector resigned & that position was not replaced. Mr. Phelps changed his time from 100% supervision to 50/50 supervision/inspector to make up some of the shortfall. Effective 12/31/2009, Ted Tiger retired and staffing became 11. Effective August, 2010, Staffing was authorized to 12 (actual staff was at 10), by year end 2010 actual and authorized staff was at 12. A 13th position has been authorized and posted effective July, 2011. A 14th position will be authorized effective January, 2012.

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- 14** Part-A General Comments/Regional Observations Info Only Info Only

Info Only = No Points

**SLR Notes:**

A.14. The OCC Pipeline Department was restored to 12 positions at the end of 2010, and will be authorized to 14 positions by January, 2012. Effective 7/1/2011, All non-regulated gas gathering line operators must report all incidents that meet Federal reporting criteria. OCC changed their enforcement procedures on 7/1/2009 to incorporate 198 into their regulations. OCC continues to work to have its authority changed to allow the State to be more stringent than the Federal Code in certain situations. OCC has been unsuccessful so far in making needed changes to the State's Damage Prevention Law to cause inclusion of civil penalties against excavators.

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Total points scored for this section: 26

Total possible points for this section: 26



## PART B - Inspections and Compliance - Procedures/Records/ Performance

Points(MAX) Score

### Inspection Procedures

- 1** Does the State have a written inspection plan to complete the following? (all types of operators including LNG) (Chapter 5.1) Previous Question B.1 + Chapter 5 Changes + Incorporate LNG 6.5 6.5  
Yes = 6.5 No = 0 Needs Improvement = 50% Deduction
- |   |   |                                      |                          |   |
|---|---|--------------------------------------|--------------------------|---|
| a | Standard Inspections (Including LNG) (Max points = 2) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b | IMP Inspections (Including DIMP) (Max points = .5)    | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c | OQ Inspections (Max points = .5)                      | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d | Damage Prevention (Max points = .5)                   | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| e | On-Site Operator Training (Max points = .5)           | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| f | Construction Inspections (Max points = .5)            | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| g | Incident/Accident Investigations (Max points = 1)     | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| h | Compliance Follow-up (Max points = 1)                 | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

#### SLR Notes:

B.1. A---, Yes, have procedures in SOP pages 1-10. The SOP shows that Units are inspected every 2-3 years, but certain Systems in large Units may be on a 4-5 year rotation. B--- IMP plan review is on an 8 yr cycle. C--- OQ plan review is on a 10 yr cycle. D--- yes, Damage Prevention is part of the Std Insp; see SOP pg 6 of 10. E--- yes, see SOP pg 7 of 10, also see questions A.3 & A.9. F. G. & H--- These inspections will be conducted as needed and as per the SOP.

- 2** Did the written Procedures for selecting operators adequately address key concerns? (Chapter 5.1) Previous Question B.2, items a-d are worth .5 point each 2 2  
Yes = 2 No = 0 Needs Improvement = 50% Deduction
- |   |  |                                      |                          |   |
|---|--|--------------------------------------|--------------------------|---|
| a | Length of time since last inspection   | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b | History of Operator/unit and/or location (including leakage , incident and compliance history) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c | Type of activity being undertaken by operator (construction etc)                               | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d | For large operators, rotation of locations inspected   | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

#### SLR Notes:

B.2. yes, Items a, b, c, & d are all found in the SOP pages 3-6 of 8.

### Inspection Performance

- 3** Did the state inspect all types of operators and inspection units in accordance with time intervals established in its written procedures? (Chapter 5.1) Previous Question B.3 2 2  
Yes = 2 No = 0

#### SLR Notes:

B.3. Yes, Units are being inspected in accordance with the SOP. Inspections are tracked to the System level & the year and type of inspection are recorded by System.

- 4** Did the state inspection form cover all applicable code requirements addressed on the Federal Inspection forms? (Chapter 5.1 (3)) Previous Question B.4 1 1  
Yes = 1 No = 0

#### SLR Notes:

B.4. Yes, OCC uses the Federal Forms and an addendum sheet.

- 5** Did state complete all applicable portions of inspection forms? (Chapter 5.1 (3)) Previous Question B.5 1 1  
Yes = 1 No = 0

#### SLR Notes:

B.5. YES. A Spot check of 8 inspections showed them to be complete. Reviewed IMP inspections NG-10-552, NG-10-107, & HL-10-017, OQ inspections NG-09-148, Standard inspections NG-10-087, NG-10-359, HL-10-011, & HL-10-013.

- 6** Did the state initiate appropriate follow-up actions to Safety Related Condition Reports? (Chapter 6.3) Previous Question B.6 .5 .5  
Yes = .5 No = 0

SLR Notes:

B.6. Yes, had 2 gas & 1 haz liq. SRCR are tracked similar to any other inspection, & updates are sent to the Feds.

<b>7</b>	Did the state review operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken? (NTSB) Previous Question B.7 Yes = .5 No = 0	.5	NA
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SLR Notes:

B.7. NA, there is no remaining cast iron in service in Oklahoma.

<b>8</b>	Did the state review 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) (NTSB) Previous Question B.8 Yes = .5 No = 0	.5	NA
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SLR Notes:

B.8. NA, there is no remaining cast iron in service in Oklahoma.

<b>9</b>	Did the state review 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? (NTSB) Previous Question B.9 Yes = .5 No = 0	.5	.5
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SLR Notes:

B.9. Yes, OCC queries the Operator, and addresses it during Standard and OQ inspections. OCC has created an addendum sheet to address this question.

<b>10</b>	Did the state review 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? (NTSB) Previous Question B.10 Yes = 1 No = 0	1	1
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SLR Notes:

B.10. Yes, Incident investigations are placed in the Operator file, & that file is reviewed by the inspector as he prepares for an inspection. Also, the OCC Field Supervisor reviews all accidents and alerts inspectors to issues found. It is also on the Std Insp Form, and all significant accidents are followed up with on-site investigation.

## Compliance - 60105(a) States

<b>11</b>	Did the state adequately document sufficient information on probable violations? (Chapter 5.2) Previous Question B.14 Yes = 1 No = 0 Needs Improvement = .5	1	1
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SLR Notes:

B.11. Yes, the inspection reports and the NOPV are kept together as one document.

<b>12</b>	Does the state have written procedures to identify the steps to be taken from the discovery to the resolution of a probable violation as specified in the "Guidelines for State Participating in the Pipeline Safety Program"? (Chapter 5.1) Previous Question D(1).1 Yes = 1 No = 0 Needs Improvement = .5	1	1
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SLR Notes:

B.12. Yes, in SOP, Part 3 Procedure.

<b>13</b>	Does the state have written procedures to notify an operator when a noncompliance is identified as specified in the "Guidelines for States Participating in the Pipeline Safety Program"? (Chapter 5.1(4)) Previous Question D(1).2 Yes = 1 No = 0 Needs Improvement = .5	1	1
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SLR Notes:

B.13. Yes, in SOP, Part 3 Procedure, & the Department Guidelines, & the Commission Rules & Practice.

<b>14</b>	Does the state have a written procedure for routinely reviewing the progress of compliance actions to prevent delays or breakdowns of the enforcement process, as required by the "Guidelines for States Participating in the Pipeline Safety Program"? (Chapter 5.1(5)) Previous Question D(1).3 Yes = 1 No = 0 Needs Improvement = .5	1	1
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SLR Notes:

<b>15</b>	Has the State issued compliance actions for all probable violations discovered? (Note : PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation) Previous Question D(1).4 Yes = 1 No = 0	1	1
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SLR Notes:

B.15. Yes, 54 in 2010, 55 in 2009, 47 in 2008, 105 in 2007, & 87 in 2006.

<b>16</b>	Did the state follow its written procedures for reviewing compliance actions and follow-up to determine that prompt corrective actions were taken by operators, within the time frames established by the procedures and compliance correspondence, as required by the "Guidelines for States Participating in the Pipeline Safety Program"? Previous Question D(1).5 Yes = 1 No = 0 Needs Improvement = .5	1	1
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SLR Notes:

B.16. Yes, the OCC follows its own procedures.

<b>17</b>	If compliance could not be established by other means, did state pipeline safety program staff request formal action, such as a "Show Cause Hearing" to correct pipeline safety violations? (check each states enforcement procedures) Previous Question D(1).6 No = 0 Yes = 1	1	1
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SLR Notes:

B.17. Yes, the mechanism is in the SOP, sec 165:20-13-15. There were no actions in 2008, 2009, or 2010, & one action in 2007, to shut in a small town. A Show Cause Hearing is scheduled for July, 2011 for probable violations discovered in 2010 (Contempt ? Town of Freedom). As of July, 2011, an incident in 2010 is on track for a Show Cause Hearing (Contempt ? Enogex).

<b>18</b>	Did the state adequately document the resolution of probable violations? (Chapter 5.1 (6)) Previous Question D(1).7 Yes = 1 No = 0 Needs Improvement = .5	1	1
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SLR Notes:

B.18. Yes, the NOPV & Operator response are placed in the Operator file, & if the operator response is sufficient, the case is closed by the Pipeline Section. The PV are recorded as violations, but no closure letter is generally sent to the Operator. If the Operator has contested the NOPV and gone to commissioner's court, then upon conclusion of the court, a court determination is placed in the public record, and the legal staff sends a letter of final resolution to the operator. A spot check of 8 inspections shows the records to be in compliance with the procedures.

<b>19</b>	Were compliance actions sent to a company officer? (manager or board member if municipal/government system) (Chapter 5.1(4)) Previous Question D(1).8 Yes = .5 No = 0	.5	.5
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SLR Notes:

B.19. Yes, it was done & the mechanism is in the SOP , pg 8 of 10.

<b>20</b>	Did the compliance proceedings give reasonable due process to all parties? (check each states enforcement procedures) Previous Question D(1).9 Yes = 1 No = 0 Needs Improvement = .5	1	1
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SLR Notes:

B.20. Yes, due process was followed.

## Compliance - 60106(a) States

<b>21</b>	Did the state use the current federal inspection form(s)? Previous Question D(2).1 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

B.21-26. NA, OCC is a 60105(a) program.

<b>22</b>	Are results adequately documented demonstrating inspection units were reviewed in accordance with state inspection plan? Previous Question D(2).2 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

B.21-26. NA, OCC is a 60105(a) program.



<b>23</b>	Were any probable violations identified by state referred to PHMSA for compliance? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.) Previous Question D(2).3 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

B.21-26. NA, OCC is a 60105(a) program.

<b>24</b>	Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? Previous Question D(2).4 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

B.21-26. NA, OCC is a 60105(a) program.

<b>25</b>	Did the state give written notice to PHMSA within 60 days of all probable violations found? Previous Question D(2).5 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

B.21-26. NA, OCC is a 60105(a) program.

<b>26</b>	Did the state initially submit adequate documentation to support compliance action by PHMSA on probable violations? Previous Question D(2).6 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

B.21-26. NA, OCC is a 60105(a) program.

<b>27</b>	Is the program manager familiar with state process for imposing civil penalties? Were civil penalties considered for repeat violations (with severity consideration) or violations resulting in incidents/accidents? (describe any actions taken) Info Only = No Points	Info Only	Info Only
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SLR Notes:

B.27. Yes, Dennis knows the process for civil penalties, and the areas where he doesn't have civil penalty authority. Consideration for repeat violations is limited but for egregious and some repeat violations escalation of civil penalties are considered. Examples include both current Show Cause Hearings.

<b>28</b>	Part B: General Comments/Regional Observations Info Only = No Points	Info Only	Info Only
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SLR Notes:

B.28. It is welcome news that you are nearly at full staff and will be authorized two additional positions by January, 2012. The heavy work load on OCC Pipeline Safety staff continued during 2010. A full performance position is expected to be 85-100 days out of office on inspections with the remainder of the 220 day man-year being spent in the office writing reports and doing follow up on issues found during those inspections. In 2010 it was observed that your staff spent 134 days out of the office on inspections which is an indication that your staff was overloaded. The PIPES ACT of 2006 makes it clear that pipeline safety involves more and more detailed inspections. Some of those additional inspections include: RP 1162, one-call, IMP, GIMP, SHRIMP, OQ, PIPES ACT (low pressure gathering), 192.8 gathering line definition, PAPEE, CRM, DIMP, etc. We appreciate your commitment for increased staffing.

Total points scored for this section: 24  
Total possible points for this section: 24

## PART C - Interstate Agent States

Points(MAX) Score

- |   |   |   |    |
|---|---|---|----|
| 1 | Did the state use the current federal inspection form(s)? Previous Question D(3).1<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|---|---|---|----|

SLR Notes:

C.1-8. NA, not an Interstate Agent.

- |   |  |   |    |
|---|--|---|----|
| 2 | Are results documented demonstrating inspection units were reviewed in accordance with "PHMSA directed inspection plan"? Previous Question D(3).2<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|---|--|---|----|

SLR Notes:

C.1-8. NA, not an Interstate Agent.

- |   |  |   |    |
|---|--|---|----|
| 3 | Did the state submit documentation of the inspections within 60 days as stated in its latest Interstate Agent Agreement form? Previous Question D(3).3<br>Yes = 1 No = 0 | 1 | NA |
|---|--|---|----|

SLR Notes:

C.1-8. NA, not an Interstate Agent.

- |   |   |   |    |
|---|---|---|----|
| 4 | Were any probable violations identified by state referred to PHMSA for compliance? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.) Previous Question D(3).4<br>Yes = 1 No = 0 | 1 | NA |
|---|---|---|----|

SLR Notes:

C.1-8. NA, not an Interstate Agent.

- |   |  |   |    |
|---|--|---|----|
| 5 | Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? Previous Question D(3).5<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|---|--|---|----|

SLR Notes:

C.1-8. NA, not an Interstate Agent.

- |   |  |   |    |
|---|--|---|----|
| 6 | Did the state give written notice to PHMSA within 60 days of all probable violations found? Previous Question D(3).6<br>Yes = 1 No = 0 | 1 | NA |
|---|--|---|----|

SLR Notes:

C.1-8. NA, not an Interstate Agent.

- |   |  |   |    |
|---|--|---|----|
| 7 | Did the state initially submit documentation to support compliance action by PHMSA on probable violations? Previous Question D(3).7<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|---|--|---|----|

SLR Notes:

C.1-8. NA, not an Interstate Agent.

- |   |   |           |           |
|---|---|-----------|-----------|
| 8 | Part C: General Comments/Regional Observations<br>Info Only = No Points | Info Only | Info Only |
|---|---|-----------|-----------|

SLR Notes:

C.1-8. NA, not an Interstate Agent.

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

## PART D - Incident Investigations

Points(MAX) Score

- |          |  |   |   |
|----------|--|---|---|
| <b>1</b> | Are state personnel following the procedures for Federal/State cooperation in case of an incident? (See Appendix in "Guidelines for States Participating in the Pipeline Safety Program") (Chapter 6.1) Previous Question E.1<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

### SLR Notes:

D.1. Yes, Appendix E specifies 1. Determine if safety violations occurred. 2. Determine root causes of the accident if asked by NTSB. 3. Cooperate with NTSB.

- |          |   |    |    |
|----------|---|----|----|
| <b>2</b> | Are state personnel familiar with the jurisdictional authority and Memorandum of Understanding between NTSB and PHMSA? (See Appendix in "Guidelines for States Participating in the Pipeline Safety Program") (Chapter 6 ? Appendix D) Previous Question E.2<br>Yes = .5 No = 0 | .5 | .5 |
|----------|---|----|----|

### SLR Notes:

D.2. Yes, the MOU between NTSB and OPS is understood, and OCC fully cooperates with NTSB.

- |          |  |   |   |
|----------|--|---|---|
| <b>3</b> | Did the state keep adequate records of incident notifications received? Previous Question E.3<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

### SLR Notes:

D.3. Yes, gas incidents are investigated and placed in the files. In addition, the incidents meeting State reporting criteria are in the files.

- |          |  |   |   |
|----------|--|---|---|
| <b>4</b> | If an onsite investigation of an incident was not made, did the state obtain sufficient information by other means to determine the facts and support the decision not to go on-site? Previous Question E.4<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

### SLR Notes:

D.4. Yes, In 2010, all 5 Federally reportable incidents were investigated on-site. In addition most state reportable incidents were investigated on-site. However the SOP provides for telephonic reporting and after-the-fact follow up.

- |          |   |                                      |  |
|----------|---|--------------------------------------|--|
| <b>5</b> | Were investigations thorough and conclusions and recommendations documented in an acceptable manner? Previous Question E.5, comprehensive question worth 2 points total<br>Yes = 2 No = 0 Needs Improvement = 1 | 2                                    | 2  |
| a.       | Observations and Document Review  | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| b.       | Contributing Factors  | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| c.       | Recommendations to prevent recurrences where appropriate  | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |

### SLR Notes:

D.5. Yes, yes, yes, OCC uses the federal Form 11 for incident investigations. The events are documented and Appendix E is followed.

- |          |   |   |   |
|----------|---|---|---|
| <b>6</b> | Did the state initiate enforcement action for violations found during any incident investigation(s)? Previous Question E.6 Variation<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

### SLR Notes:

D.6. Yes, the SOP dictates action similar to any other violation.

- |          |  |    |     |
|----------|--|----|-----|
| <b>7</b> | Did the state assist region office by taking appropriate follow-up actions related to the operator incident reports to ensure accuracy and final report has been received by PHMSA? (validate annual report data from operators concerning incidents/accidents and investigate discrepancies) (Chapter 6) Previous Question E.7/E.8<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

### SLR Notes:

D.7 yes, OCC is a full partner with PHMSA to ensure that incident reports are accurate & updated, and the reports are reviewed for completeness & to ensure that a final report is submitted.

- |          |   |           |           |
|----------|---|-----------|-----------|
| <b>8</b> | Part D: General Comments/Regional Observations<br>Info Only = No Points | Info Only | Info Only |
|----------|---|-----------|-----------|

### SLR Notes:

D.8. There were no fatalities but one injury in 2010 due to reportable incidents. Lack of span of control resulted in a crew doing work which inadvertently

defeated a gas lockout tag out, which allowed gas to go where it was not supposed to be which came in contact with spark which then ignited and caused burn injury to a member of another crew. All 5 Federally reportable incidents were investigated on-site.

---

Total points scored for this section: 7  
Total possible points for this section: 7



## PART E - Damage Prevention Initiatives

Points(MAX)    Score

- |          |  |   |   |
|----------|--|---|---|
| <b>1</b> | Has the state reviewed 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? Previous Question B.11<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

### SLR Notes:

E.1. Yes, it is addressed in standard inspections during review of line locate and one-call procedures. OCC has created an addendum sheet to address this question.

- |          |  |   |   |
|----------|--|---|---|
| <b>2</b> | Did the state inspector check to assure the pipeline operator is following its written procedures pertaining to notification of excavation, marking, positive response and the availability and use of the one call system? New 2008<br>Yes = 2 No = 0 | 2 | 2 |
|----------|--|---|---|

### SLR Notes:

E.2. Yes, it is part of the Standard Inspection Forms for Form 1, Form 2, & Form 3.

- |          |   |   |   |
|----------|---|---|---|
| <b>3</b> | Did the state encourage and promote the adoption of the Common Ground Alliance Best Practices document to its regulated companies as a means of reducing damages to all underground facilities? Previous Question A.7<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

### SLR Notes:

E.3. Yes, OCC gives a One-Call & RP 1162 Seminar every 18 months in conjunction with the TSI Seminars. They also give a One-Call & RP 1162 Seminar in the annual Municipal presentations. OK requires that either one call notifications be made or that pre-engineered & certified projects be followed.

- |          |   |   |   |
|----------|---|---|---|
| <b>4</b> | 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? New 2008<br>Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

### SLR Notes:

E.4. Okay, OCC is focused on excavation line leaks not line hits. It is being counted and reported by Oklahoma One Call. Line locates were 3,966,025 in 2010 and Line leaks were 1684. Recommended to start capturing total count of reported line hits. Also recommended that One-Call laws be revised to specify the reporting of all line hits by operators and excavators.

- |          |  |   |   |
|----------|--|---|---|
| <b>5</b> | Did the state review operators' records of accidents and failures due to excavation damage to ensure causes of failure are addressed to minimize the possibility of recurrence as required by 192.617?<br>Yes = 2 No = 0 | 2 | 2 |
|----------|--|---|---|

### SLR Notes:

E.5. Yes, Federal incident/accident forms and DIRT are used.

- |          |   |           |           |
|----------|---|-----------|-----------|
| <b>6</b> | Part E: General Comments/Regional Observations<br>Info Only = No Points | Info Only | Info Only |
|----------|---|-----------|-----------|

### SLR Notes:

E.6. 49 CFR Part 198 has been adopted effective 7/1/2009. OCC continues to work on achieving the 9 elements of the 2006 PIPES ACT.

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

## PART F - 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:  
Eastok Pipeline, LLC OPID 32491, Tulsa Unit, Wagner 12" Discharge

Name of State Inspector(s) Observed:  
Rick Matthews, Randy Snyder, & Kelly, Phelps

Location of Inspection:  
Eastok Pipeline, LLC, 2424 E 21st St., Ste 550, Tulsa, OK 74114

Date of Inspection:  
4/18-19/2011

Name of PHMSA Representative:  
Patrick Gaume

### SLR Notes:

Eastok Pipeline, LLC OPID 32491, Tulsa Unit, Wagner 12" Discharge  
Rick Matthews, Randy Snyder, & Kelly, Phelps  
Eastok Pipeline, LLC, 2424 E 21st St., Ste 550, Tulsa, OK 74114  
4/18-19/2011 Patrick Gaume

- 2** Was the operator or operator's representative notified and/or given the opportunity to be present during inspection? New 2008 1 1  
Yes = 1 No = 0

### SLR Notes:

F.2. yes, and the inspection was held in the Operator's office. 5 operator and contract personnel participated in the inspection

- 3** Did the inspector use an acceptable inspection form/checklist and was the form/checklist used as a guide for the inspection? (New regulations shall be incorporated) Previous Question F.2 2 2  
Yes = 2 No = 0

### SLR Notes:

F.3. yes, used the Federal Form 1, for Gas Transmission Standard Inspection, revision dated 4/6/2011.

- 4** Did the inspector thoroughly document results of the inspection? Previous Question F.3 2 2  
Yes = 2 No = 0

### SLR Notes:

F.4. yes, the Federal Form 1 was used. The form was totally filled out.

- 5** Did the inspector check to see if the operator had necessary equipment during inspection to conduct tasks viewed? (Maps, pyrometer, soap spray, CGI, etc.) New 2008 1 1  
Yes = 1 No = 0

### SLR Notes:

F.5. Yes, he had system maps, multi meter, half cell, line locate equip, gate keys, cell phone, etc.

- 6** What type of inspection(s) did the state inspector conduct during the field portion of the state evaluation? (i.e. Standard, Construction, IMP, etc) New 2008 Info Only Info Only  
Info Only = No Points

### SLR Notes:

F.6. It was a standard inspection of a gas transmission line with a field OQ for line locate, CP reading, and rectifier inspection.

- 7** Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list) New 2008, comprehensive question worth 2 points total 2 2  
Yes = 2 No = 0 Needs Improvement = 1
- a. Procedures ☒
- b. Records ☒
- c. Field Activities/Facilities ☒

d. Other (Please Comment)



SLR Notes:

F.7. Yes, for Procedures, Records, Field, and OQ Protocol 9.

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8	Did the inspector have adequate knowledge of the pipeline safety program and regulations? (Liaison will document reasons if unacceptable) Previous Question F.8	2	2
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Yes = 2 No = 0

SLR Notes:

F.8. yes, Rick & Randy showed good & adequate knowledge of the pipeline safety program goals and regulations.

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9	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) Previous Question F.10	1	1
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Yes = 1 No = 0

SLR Notes:

F.9. Yes, he noted concerns about IR drop, line markers in line of sight, a regular review of abnormal operating procedures, and to install adjustable pipe supports.

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10	During the exit interview, did the inspector identify probable violations found during the inspections? Previous Question F.11	1	1
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Yes = 1 No = 0

SLR Notes:

F.10. Yes, he noted concerns about IR drop, line markers in line of sight, a regular review of abnormal operating procedures, and to install adjustable pipe supports.

---

11	What did the inspector observe in the field? (Narrative description of field observations and how inspector performed)	Info Only	Info Only
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Info Only = No Points

SLR Notes:

F.11. Yes. Verified field equipment was available, the emergency valve at the compressor station was well marked and accessible, atmosphere corrosion, signs and pipeline markers, within normal operating pressures, locks and site security, fencing, emergency contact number, flange ratings, valve ratings, bolts and threads, line locate and marking, pig launcher and receiver, noted compressed air supply for compressor station instrumentation, pipe CP, new system has no casing, abundant secondary containment, discussed records relative to the amine and glycol units, condition of pipe supports, ROW, ROW encroachment, highway crossings, test stations, rectifier check and reading, valve spacing.

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12	Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices)	Info Only	Info Only
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Info Only = No Points

SLR Notes:

F.12. The value of having adjustable pipe supports was apparent.

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13	Field Observation Areas Observed (check all that apply)	Info Only	Info Only
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Info Only = No Points

a.	Abandonment	<input type="checkbox"/>
b.	Abnormal Operations	<input checked="" type="checkbox"/>
c.	Break-Out Tanks	<input type="checkbox"/>
d.	Compressor or Pump Stations	<input type="checkbox"/>
e.	Change in Class Location	<input checked="" type="checkbox"/>
f.	Casings	<input checked="" type="checkbox"/>
g.	Cathodic Protection	<input checked="" type="checkbox"/>
h.	Cast-iron Replacement	<input type="checkbox"/>
i.	Damage Prevention	<input checked="" type="checkbox"/>
j.	Deactivation	<input type="checkbox"/>
k.	Emergency Procedures	<input type="checkbox"/>
l.	Inspection of Right-of-Way	<input checked="" type="checkbox"/>
m.	Line Markers	<input checked="" type="checkbox"/>
n.	Liaison with Public Officials	<input type="checkbox"/>
o.	Leak Surveys	<input type="checkbox"/>

p.	MOP	<input type="checkbox"/>
q.	MAOP	<input checked="" type="checkbox"/>
r.	Moving Pipe	<input type="checkbox"/>
s.	New Construction	<input type="checkbox"/>
t.	Navigable Waterway Crossings	<input type="checkbox"/>
u.	Odorization	<input type="checkbox"/>
v.	Overpressure Safety Devices	<input type="checkbox"/>
w.	Plastic Pipe Installation	<input type="checkbox"/>
x.	Public Education	<input type="checkbox"/>
y.	Purging	<input type="checkbox"/>
z.	Prevention of Accidental Ignition	<input type="checkbox"/>
A.	Repairs	<input type="checkbox"/>
B.	Signs	<input checked="" type="checkbox"/>
C.	Tapping	<input type="checkbox"/>
D.	Valve Maintenance	<input checked="" type="checkbox"/>
E.	Vault Maintenance	<input type="checkbox"/>
F.	Welding	<input type="checkbox"/>
G.	OQ - Operator Qualification	<input checked="" type="checkbox"/>
H.	Compliance Follow-up	<input type="checkbox"/>
I.	Atmospheric Corrosion	<input checked="" type="checkbox"/>
J.	Other	<input type="checkbox"/>

**SLR Notes:**

F.13 Yes, items included; b, e, f, g, i, l, m, q, B, D, G, & I.

**14** Part F: General Comments/Regional Observations

Info Only Info Only

Info Only = No Points

**SLR Notes:**

F.14. GAS Mr. Rick Matthews and Randy Snyder were observed conducting a standard inspection of a gas transmission Unit of Eastok Pipeline, LLC OPID 32491, Tulsa Unit, Wagner 12" Discharge. The inspection included procedures, records, field, and an OQ Protocol 9. They showed professional level knowledge of the pipeline safety program goals and regulations, and they conducted themselves cordially and professionally while performing the inspection.

Total points scored for this section: 12  
Total possible points for this section: 12





## PART G - PHMSA Initiatives - Strategic Plan

Points(MAX) Score

### Risk base Inspections - Targeting High Risk Areas

- 1** Does state have process to identify high risk inspection units? 1.5 1.5  
Yes = 1.5 No = 0

Risk Factors (criteria) to consider may include:

Miles of HCA's, Geographic area, Population Density

Length of time since last inspection

History of Individual Operator units (leakage, incident and compliance history, etc.)

Threats - (Excavation Damage, Corrosion, Natural Forces, Other Outside Forces, Material or Welds, Equipment, Operations, Other)

#### SLR Notes:

G.1. YES, the various risk factors have been identified and written into the SOP. The database has been developed, is being used, and is being reviewed and refined for its value. Right now the value of the database is minimal to moderate. Discussion with other state program managers has started.

- 2** Are inspection units broken down appropriately? (see definitions in Guidelines) .5 0.5  
Yes = .5 No = 0

#### SLR Notes:

G.2. Yes. OCC inspection Units are consistent with Inspection Unit as defined in the Guidelines Glossary.

- 3** Consideration of operators DIMP Plan? (if available and pending rulemaking) Info Only Info Only  
Info Only = No Points

#### SLR Notes:

G.3. OCC is aware of the pending DIMP Rule and will implement the DIMP inspections per the federal guidelines.

- 4** Does state inspection process target high risk areas? .5 0.5  
Yes = .5 No = 0

#### SLR Notes:

G.4. Yes, the SOP names several high risk factors to consider, and units are selected for inspection in accordance with the SOP.

### Use of Data to Help Drive Program Priority and Inspections

- 5** Does state use data to analyze effectiveness of damage prevention efforts in the state? (DIRT or other data, etc) .5 0  
Yes = .5 No = 0

#### SLR Notes:

G.5. No 0 pts, OCC has not found a way to gather data and analyze its effectiveness of damage prevention efforts in the state. This is necessary to fulfill the 9 elements of Damage Prevention. During the evaluation a discussion was made concerning using 192.614(C) and 192.615(A) specifically and .613 to .617 generally as a means of reviewing line hit repairs and measuring an operator's mitigation effectiveness.

- 6** Has state reviewed data on Operator Annual reports for accuracy? .5 0.5  
Yes = .5 No = 0

#### SLR Notes:

G.6. Yes, the OCC Pipeline Program Manager personally reviews current annual reports against prior year reports and contacts the Operators when there are questions over the data. Also, pipeline mileage is used for assessing user fees so it is closely monitored.

- 7** Has state analyzed annual report data for trends and operator issues? .5 0.5  
Yes = .5 No = 0

#### SLR Notes:

G.7. Yes, OCC reviews the Form for completeness, miles of pipe, & lost and unaccounted for gas and trends it relative to prior years, also for data accuracy into various columns. Finally the spreadsheet has 15 years of annual report data.

- 8** Has state reviewed data on Incident/Accident reports for accuracy? .5 0.5  
Yes = .5 No = 0

#### SLR Notes:

G.8. Yes, Reportable incidents are investigated relative to minimizing future events, including those due to excavation damage.

<b>9</b>	Does state do evaluation of effectiveness of program based on data? (i.e. performance measures, trends, etc.)	.5	0.5
	Yes = .5 No = 0		

**SLR Notes:**

G.9. Yes, detailed review of annual reports to determine miles, type, and age of pipe; review of incident data like the manner and type of an equipment failure and then apply the lessons learned State wide; determine the rate of removal, replacement or mitigation of higher risk pipes.

<b>10</b>	Did the State input all operator qualification inspection results into web based database provided by PHMSA in a timely manner upon completion of OQ inspections? Previous Question B.15	.5	0.5
	Yes = .5 No = 0		

**SLR Notes:**

G.10. Yes, all of the Standard and Protocol 9 OQ inspections for 2010 have been uploaded, typically within 60 days of the inspection. The focus in 2010 was to conduct Protocol 9 inspections in every Unit that had a standard inspection. There were some violations found during those Protocol 9 reviews.

<b>11</b>	Did the State submit their replies into the Integrity Management Database (IMDB) in response to the Operators notifications for their integrity management program? Previous Question B.16	.5	NA
	Yes = .5 No = 0		

**SLR Notes:**

G.11. NA. For both GIMP & LIMP. In 2010 there were no replies for GIMP or LIMP

<b>12</b>	Have the IMP Federal Protocol forms been uploaded to the IMDB? Previous Question B.17	.5	0.5
	Yes = .5 No = 0		

**SLR Notes:**

G.12. Yes, all inspections for 2010 and to date 2011 have been uploaded into IMDB. In 2010 most of the uploads were Protocol A or Protocol 1 reviews.

<b>13</b>	Did the State ask Operators to identify any plastic pipe and components that has shown a record of defects/leaks and what those operators are doing to mitigate the safety concerns? Previous Question B.18	.5	0.5
	Yes = .5 No = 0		

**SLR Notes:**

G.13. Oklahoma's major Operators are all participants in the Plastic Pipe Study. They have uploaded their information into the study, and have stated they are willing to share their information with other Operators. It is noted that the Operators are not sharing the info with OCC or PHMSA.

<b>14</b>	Has state confirmed transmission operators have submitted information into National Pipeline Mapping System (NPMS) database along with any changes made after original submission?	.5	0.5
	Yes = .5 No = 0		

**SLR Notes:**

G.14. Yes. It was being done and it is now on the new Standard Inspection Form.

## Accident/Incident Investigation Learning and Sharing Lessons Learned

<b>15</b>	Has state shared lessons learned from incidents/accidents? (i.e. NAPSIR meetings and communications)	.5	0.5
	Yes = .5 No = 0		

**SLR Notes:**

G.15. Yes, OCC makes a report during the SW Region NAPSIR Meeting, and responds as appropriate to email correspondence.

<b>16</b>	Does the State support data gathering efforts concerning accidents? (Frequency/Consequence/etc)	.5	0.5
	Yes = .5 No = 0		

**SLR Notes:**

G.16. Yes, reports are received, follow-up is made, paperwork is checked, lessons learned are derived, Accident causes and regulatory compliance are determined, and site visits are usually made. Inspector duties are strongly outlined in the SOP.

<b>17</b>	Does state have incident/accident criteria for conducting root cause analysis?	Info Only	Info Only
	Info Only = No Points		

**SLR Notes:**

G.17. OCC does not have a formal Root Cause Analysis at this time. Six inspectors have taken the Root Cause class. The other inspectors are on the Root Cause class wait list. They do search for probable cause and compliance with the regulations at this time. They are also using the DIRT Form.

**18** Does state conduct root cause analysis on incidents/accidents in state?

Info Only Info Only

Info Only = No Points

**SLR Notes:**

G.18. OCC does not have a formal Root Cause Analysis at this time. Six inspectors have taken the Root Cause class. The other inspectors are on the Root Cause class wait list. They do search for probable cause and compliance with the regulations at this time. They are also using the DIRT Form.

**19** Has state participated on root cause analysis training? (can also be on wait list)

.5

0.5

Yes = .5 No = 0

**SLR Notes:**

G.19. YES. Six inspectors have taken the Root Cause class. The other inspectors are on the Root Cause class wait list.

## Transparency - Communication with Stakeholders

**20** Other than pipeline safety seminar does State communicate with stakeholders? (Communicate program data, pub awareness, etc.)

.5

0.5

Yes = .5 No = 0

**SLR Notes:**

G.20. Yes, is providing a Pipeline Safety Seminar every eighteen months instead of every 3rd year. Every inspector is providing 5 individual operator training sessions per year (9 inspectors \* 5 sessions/inspector = 45 sessions per year). There are also 5 to 10 small operator training seminars given around the State each year. They participate in the Okie One Call (OPAL) public awareness program, also participate with several Operators in their programs, also participate with the PRC/Pipeline Group public awareness program. They are continuing to work on the 9 elements from the 2006 PIPES ACT.

**21** Does state share enforcement data with public? (Website, newsletters, docket access, etc.)

.5

0.5

Yes = .5 No = 0

**SLR Notes:**

G.21. Yes, all Operators have docket access and OCC is moving to establish a Pipeline Safety website where all finalized inspection reports, along with findings of violations, will be available to the public. Currently the Public has rights to request and receive paper and electronic records.

**22** Part G: General Comments/Regional Observations

Info Only Info Only

Info Only = No Points

**SLR Notes:**

G.22. OCC Pipeline Group is getting its training, providing training, analyzing and acting on data, is sharing lessons learned with NAPSRS, PHMSA, and industry, is uploading data to all the various databases, and working to increase its transparency.

Total points scored for this section: 9  
Total possible points for this section: 9.5

## PART H - Miscellaneous

Points(MAX) Score

- |          |  |    |     |
|----------|--|----|-----|
| <b>1</b> | What were the major accomplishments for the year being evaluated? (Describe the accomplishments, NAPSRR Activities and Participation, etc.)<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

### SLR Notes:

H.1. In 2010 The OCC has increased its transparency by uploading all final reports onto the OCC web site. These reports include; incident and accidents, Standard inspections, Operator Qualification inspections, Integrity Management inspections, Construction inspections, etc. Mr. Fothergill testified during several Legislative Committee Meetings in efforts to promote pipeline safety matters; specifically One-Call improvements, effective civil penalties on excavators violating the One-Call laws, and to establish that the Commission can be more stringent than the federal guidelines. OCC participated on 5 NAPSRR Committees, specifically the Liaison, the Legislative, the GPTC, the Plastic Pipe ad hoc, and the OQ/QMS. Mr. Fothergill responded to all NAPSRR surveys, ballots, and inquiries. OCC also supplies four man-weeks of associate staff to TQ to support Inspector training (the Welding class). OCC participates with the Oklahoma Gas Assoc (OGA) to provide lessons learned during their annual meeting. The OCC participates with two public Awareness programs, the Okla Public Awareness Liaison (OPAL) & the Okla Public Awareness (OPA), providing them with information and serving on panels during their meetings. The OCC has created a state law that requires all federally non-regulated gas gathering systems to report all incidents that meet the federal reporting criteria.

- |          |  |    |     |
|----------|--|----|-----|
| <b>2</b> | What legislative or program initiatives are taking place/planned in the state, past, present, and future? (Describe initiatives (i.e. damage prevention, jurisdiction/authority, compliance/administrative, etc.)<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

### SLR Notes:

H.2. The Pipeline Dept enforces current Federal Regulations and provides technical information to the OK Legislature to make changes as needed in State Laws. Present legislative efforts are to allow the OCC to be more stringent that the Federal Regulations, and to implement all 9 elements of the 2006 PIPES Act.

- |          |  |    |     |
|----------|--|----|-----|
| <b>3</b> | Any Risk Reduction Accomplishments/Projects? (i.e. Cast iron replacement projects,bare steel,third-party damage reductions, etc.)<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

### SLR Notes:

H.3. Yes, OCC is in its 7th year of an ongoing project to move the gas meter from the property line to the house/building wall. The purpose is to transfer ownership and maintenance of the gas line from the homeowner to the LDC. The OCC has already imposed line locate and leak survey duties onto the LDC companies. Cast Iron has been gone for the last 15 years. The OCC has created a state law that requires all federally non-regulated gas gathering systems to report all incidents that meet the federal reporting criteria.

- |          |   |   |   |
|----------|---|---|---|
| <b>4</b> | Did the state participate in/respond to surveys or information requests from NAPSRR or PHMSA?<br>Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

### SLR Notes:

H.4. Yes, OCC works with NAPSRR, TQ, NTSB, PHMSA, and is on various committees. Dennis Fothergill is on the NAPSRR Committee that asks these questions!!

- |          |   |    |     |
|----------|---|----|-----|
| <b>5</b> | Sharing Best Practices with Other States - (General Program)<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|---|----|-----|

### SLR Notes:

H.5. Yes, through SW Region NAPSRR, correspondence with other States, other NAPSRR & PHMSA committees. A specific example is the Fisher Regulator issue, and allowed the AOGC inspector to ride along with OCC inspectors.

- |          |   |           |           |
|----------|---|-----------|-----------|
| <b>6</b> | Part H: General Comments/Regional Observations<br>Info Only = No Points | Info Only | Info Only |
|----------|---|-----------|-----------|

### SLR Notes:

H.6. In 2010 The OCC has increased its transparency by uploading all final reports onto the OCC web site. These reports include; incident and accidents, Standard inspections, Operator Qualification inspections, Integrity Management inspections, Construction inspections, etc. Mr. Fothergill testified during several Legislative Committee Meetings in efforts to promote pipeline safety matters; specifically One-Call improvements, effective civil penalties on excavators violating the One-Call laws, and to establish that the Commission can be more stringent than the federal guidelines. OCC participated on 5 NAPSRR Committees, specifically the Liaison, the Legislative, the GPTC, the Plastic Pipe ad hoc, and the OQ/QMS. Mr. Fothergill responded to all NAPSRR surveys, ballots, and inquiries. OCC also supplies four man-weeks of associate staff to TQ to support Inspector training (the Welding class). OCC participates with the Oklahoma Gas Assoc (OGA) to provide lessons learned during their annual meeting. The OCC participates with two public Awareness programs, the Okla Public Awareness Liaison (OPAL) & the Okla Public Awareness (OPA), providing them with information and serving on panels during their meetings. The OCC has created a state law that requires all federally non-regulated gas gathering systems to report all incidents that meet the federal reporting criteria.

Total points scored for this section: 3

Total possible points for this section: 3

## PART I - Program Initiatives

Points(MAX) Score

### Drug and Alcohol Testing (49 CFR Part 199)

- |          |   |   |   |
|----------|---|---|---|
| <b>1</b> | Has the state verified that operators have drug and alcohol testing programs?<br>Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

SLR Notes:

I.1. Yes, since the inception of the D&A Program, and verifies with all new Operators.

- |          |  |    |     |
|----------|--|----|-----|
| <b>2</b> | Is the state verifying that operators are conducting the drug and alcohol tests required by the operators program (random, post-incident, etc.)<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

I.2. Yes, in 2010 OCC filled out a Form 13 for every Unit that had a Standard Inspection.

- |          |   |    |     |
|----------|---|----|-----|
| <b>3</b> | Is the state verifying that any positive tests are responded to in accordance with the operator's program?<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|---|----|-----|

SLR Notes:

I.3. Yes, in 2010 OCC started demanding MIS data from all operators and has incorporated the MIS demand into its state regulations effective 7/1/2011. This question is asked when a positive drug test is found. Effective 7/20/2011 protocol question A.02.b from Form 3.1.11 (see page 8 of 56+-) will be used in the review of every MIS submission that shows a positive drug test.

### Qualification of Pipeline Personnel (49 CFR Part 192 Subpart N)

- |          |   |   |   |
|----------|---|---|---|
| <b>4</b> | Has the state verified that operators have a written qualification program?<br>Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

SLR Notes:

I.4. Yes. All Operators have been OQ inspected and re-inspected. In 2010 Protocol 9 inspections were done on every Unit that had a Standard Inspection.

- |          |  |    |     |
|----------|--|----|-----|
| <b>5</b> | Has the state reviewed operator qualification programs for compliance with PHMSA rules and protocols?<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

I.5. Yes, All OQ inspections were done using Federal Forms and according to Federal guidelines. All Operators came into compliance.

- |          |  |    |     |
|----------|--|----|-----|
| <b>6</b> | Is the state verifying that persons who perform covered tasks for the operator are qualified in accordance with the operator's program?<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

I.6. Yes, it is covered in the OQ inspections. Also Protocol 9 reviews are done every year.

- |          |  |    |     |
|----------|--|----|-----|
| <b>7</b> | Is the state verifying that persons who perform covered task for the operator are requalified at the intervals specified in the operator's program?<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

I.7. Yes, OQ records are checked during every OQ inspection and every Protocol 9 inspection.

### Gas Transmission Pipeline Integrity Management (49 CFR Part 192 Subpart O)

- |          |  |   |   |
|----------|--|---|---|
| <b>8</b> | Has the state verified that all operators with transmission pipelines have either adopted an integrity management program (IMP), or have properly determined that one is not required?<br>Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

I.8. Yes, all Gas Operators have been contacted. All Gas Operators have either declared they have prepared a GIMP program or declared they have no HCAs. Every Gas Operator with an identified HCA has received a full GIMP Inspection. The inspections have been uploaded into the fed database. All Gas Operator Protocol A have been reviewed.

- |          |  |    |     |
|----------|--|----|-----|
| <b>9</b> | Has the state verified that in determining whether a plan is required, the operator correctly calculated the potential impact radii and properly applied the definition of a high consequence area?<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

I.9. Yes, the impact radii calculations and the HCA determinations have been verified during every GIMP review.

<b>10</b>	Has the state reviewed operator IMPs for compliance with Subpart O? (In accordance with State Inspection plan) Yes = .5 No = 0	.5	0.5
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SLR Notes:

I.10. Yes, all initial GIMP have been done and compliance with subpart O has been checked.

<b>11</b>	Is the state monitoring operator progress on the inspections, tests and remedial actions required by the operator's IMP, including that they are being done in the manner and schedule called for in its IMP? Yes = .5 No = 0	.5	0.5
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SLR Notes:

I.11. Yes, tests and remedial actions are being checked for compliance with their plan.

<b>12</b>	Is the state verifying that operators are periodically examining their transmission line routes for the appearance of new HCAs? Yes = .5 No = 0	.5	0.5
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SLR Notes:

I.12. Yes, all Gas Transmission Operators have had their first GIMP inspection, and they will be reviewed relative to what was found during the prior inspection. This question has been added to the Form 1 addendum sheet since November, 2010.

## Public Awareness (49 CFR Section 192.616)

<b>13</b>	Has the state verified that each operator has developed a continuing public awareness program? (due date was 6/20/06 for most operators, 6/20/07 for certain very small operators, 6/13/08 for master meters) Yes = .5 No = 0	.5	0.5
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SLR Notes:

I.13. Yes, and have also reviewed and resolved with the Operator all the Clearing House and CATS exceptions.

<b>14</b>	Has the state reviewed the content of these programs for compliance with 192.616 (by participating in the Clearinghouse or by other means)? Yes = .5 No = 0	.5	0.5
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SLR Notes:

I.14. Yes, and have also reviewed and resolved with the Operator all the Clearing House and CATS exceptions.

<b>15</b>	Is the state verifying that operators are conducting the public awareness activities called for in its program? Yes = .5 No = 0	.5	0.5
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SLR Notes:

I.15. Yes, through records review during Standard Inspections and providing instruction about it during the public awareness meetings that are conducted several times per year.

<b>16</b>	Is the state verifying that operators have evaluated their Public Awareness programs for effectiveness as described in RP1162? Info Only = No Points	Info Only	Info Only
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SLR Notes:

I.16. Yes, in progress; two OCC inspectors have received the PAPEE Class in Houston in June, 2011. The inspection form and associated guidance has been received.

<b>17</b>	Part I: General Comments/Regional Observations Info Only = No Points	Info Only	Info Only
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SLR Notes:

I.17. OCC has an active D&A inspection program, is current with OQ inspections, has performed all the initial GIMP inspections, has done all of the Public Awareness reviews, and are prepared to conduct the PAPEE reviews.

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