



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

1200 New Jersey Avenue SE
Washington DC 20590

2011 Natural Gas State Program Evaluation

for

Oklahoma Corporation Commission

Document Legend

PART:

- O -- Representative Date and Title Information
- A -- Progress Report and Program Documentation Review
- B -- Program Inspection Procedures
- C -- Program Performance
- D -- Compliance Activities
- E -- Incident Investigations
- F -- Damage Prevention
- G -- Field Inspections
- H -- Interstate Agent State (If Applicable)
- I -- 60106 Agreement State (If Applicable)



2011 Natural Gas State Program Evaluation -- CY 2011
Natural Gas

State Agency: Oklahoma

Agency Status:

Date of Visit: 03/12/2012 - 09/21/2012

Agency Representative: Dennis Fothergill, Pipeline Safety Manager

PHMSA Representative: Patrick Gaume, State Liaison

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

Name/Title: Ms. Patrice Douglas, 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

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 2011 (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 progress report attachments provide the basis for determining the state's pipeline safety grant allocation.

Field Inspection (PART G):

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 G, the PHMSA representative should include a written summary which thoroughly documents the inspection.

Scoring Summary

PARTS

Possible Points Points Scored

A Progress Report and Program Documentation Review
B Program Inspection Procedures
C Program Performance
D Compliance Activities
E Incident Investigations
F Damage Prevention
G Field Inspections
H Interstate Agent State (If Applicable)
I 60106 Agreement State (If Applicable)

10 10
15 15
44 44
14 14
9 9
8 8
12 12
0 0
0 0

TOTALS

112 112

State Rating

100.0

PART A - Progress Report and Program Documentation Review

Points(MAX) Score

- | | | | |
|---|-------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 1 | Accuracy of Jurisdictional Authority and Operator/Inspection Units Data - Progress Report Attachment 1 (A1a)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|-------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Evaluator Notes:

A1. Yes. Attachment 1 and Attachment 3 are in agreement and match State Records

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|---|----------------------------------------------------------------------------------------------------------------------|---|---|
| 2 | Review of Inspection Days for accuracy - Progress Report Attachment 2 (A1b)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|----------------------------------------------------------------------------------------------------------------------|---|---|

Evaluator Notes:

A2. Yes. Attachment 2 is in agreement with OCC State records

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|---|----------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 3 | Accuracy verification of Operators and Operators Inspection Units in State - Progress Report Attachment 3 (A1c)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|----------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Evaluator Notes:

A3. Yes. Attachment 3 is correct; discrepancies with the operator lists out of PDM were explained. I most cases it was non-regulated operators making submission of non-jurisdictional pipe.

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|---|--------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 4 | Were all federally reportable incident reports listed and information correct? - Progress Report Attachment 4 (A1d)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|--------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Evaluator Notes:

A4. Yes. 5 federally reportable incidents, 5 reports.

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|---|------------------------------------------------------------------------------------------------------------------------------|---|---|
| 5 | Accuracy verification of Compliance Activities - Progress Report Attachment 5 (A1e)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|------------------------------------------------------------------------------------------------------------------------------|---|---|

Evaluator Notes:

A5. Yes. Attachment 5 is internally consistent and in agreement with State records.

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|---|---------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 6 | Were pipeline program files well-organized and accessible? - Progress Report Attachment 6 (A1f, A4)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|---------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Evaluator Notes:

A6. Yes, the paper files are in the Pipeline Section Office area and are well organized.

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|---|--------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 7 | Was employee listing and completed training accurate and complete? - Progress Report Attachment 7 (A1g)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|--------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Evaluator Notes:

A7. Yes. This information is auto loaded from the TQ database. Managers and individual inspectors double check their records.

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|---|-----------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 8 | Verification of Part 192,193,198,199 Rules and Amendments - Progress Report Attachment 8 (A1h)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|-----------------------------------------------------------------------------------------------------------------------------------------|---|---|

Evaluator Notes:

A8. Yes. The Oklahoma laws are properly cross referenced to Attachment 8.

- 9 List of Planned Performance - Did state describe accomplishments on Progress Report in detail - Progress Report Attachment 10 (H1-3) 1 1
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

A9. Yes. Staff status-historically authorized for 13 FTE, reduced to 12 FTE in 2008; 1/1/11 authorized for 12 FTE w/ 12 employees; 7/1/11-changed authorization to 14 FTE; 12/31/11-14 FTE w/ 12 employees; 4/23/12-14 FTE & 14 employees. In 2011 there was 1 retirement & 1 hire. In transition toward electronic files, Continuing efforts to implement all 9 elements of Damage prevention.

10 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

A10. OCC Pipeline Dept anticipates approval for 15 FTE on 1/1/13 with an effective date of 7/1/13. The FTE will be a technical resource for IMP, OQ, PAPEI, CRM, and other specialized inspections. The Commission is working with the underground facility owners, excavators, property owners, local, county and state governmental entities and the board of directors for the One Call to bring the State's underground damage preventions statutes into compliance with 9 elements of the damage prevention part of the pipeline safety act of 2006. To date they have had three meetings and subgroups have been established to address all 9 elements.

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



PART B - Program Inspection Procedures

Points(MAX) Score

- | | | | |
|----------|--------------------------------------------------------------------|---|---|
| 1 | Standard Inspections (B1a)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--------------------------------------------------------------------|---|---|

Evaluator Notes:

B1. 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. Std insp 1-5 years per risk ranking.

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|----------|---------------------------------------------------------------------------------|---|---|
| 2 | IMP Inspections (including DIMP) (B1b)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---------------------------------------------------------------------------------|---|---|

Evaluator Notes:

B2. Yes. IMP plan review is on an 8 yr cycle. It is presently not risk ranked. Changes in HCAs are addressed during Std Inspections using their Oklahoma Addendum.

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|----------|---------------------------------------------------------------|---|---|
| 3 | OQ Inspections (B1c)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---------------------------------------------------------------|---|---|

Evaluator Notes:

B3. Yes. OQ plan review is on a 10 yr cycle.

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|----------|------------------------------------------------------------------------------|---|---|
| 4 | Damage Prevention Inspections (B1d)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|------------------------------------------------------------------------------|---|---|

Evaluator Notes:

B4. Yes, Damage Prevention is part of the Std Insp; see SOP pg 7 of 10.

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|----------|--------------------------------------------------------------------------|---|---|
| 5 | On-Site Operator Training (B1e)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--------------------------------------------------------------------------|---|---|

Evaluator Notes:

B5. Yes, see SOP pg 8 of 10.

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|----------|-------------------------------------------------------------------------|---|---|
| 6 | Construction Inspections (B1f)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|-------------------------------------------------------------------------|---|---|

Evaluator Notes:

B6. Yes. These inspections will be conducted as needed and as per the SOP pg 4 of 10.

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|----------|--------------------------------------------------------------------------------|---|---|
| 7 | Incident/Accident Investigations (B1g)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--------------------------------------------------------------------------------|---|---|

Evaluator Notes:

B7. Yes. These inspections will be conducted as needed and as per the SOP pg 7 of 10.

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|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 8 | Does inspection plan address inspection priorities of each operator, and if necessary each unit, based on the following elements? (B2a-d, G1,2,4)
Yes = 6 No = 0 Needs Improvement = 1-5 | 6 | 6 |
|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

- | | | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|--------------------------|-----------------------------------------|
| a. Length of time since last inspection | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c. Type of activity being undertaken by operators (i.e. construction) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d. Locations of operators inspection units being inspected - (HCA's, Geographic areas, Population Density, etc) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| e. Process to identify high-risk inspection units that includes all threats - (Excavation Damage, Corrosion, Natural Forces, Outside Forces, Material and Welds, Equipment, Operators and any Other Factors) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

f. Are inspection units broken down appropriately?

Yes ☒ No ☐ Needs Improvement ☐

Evaluator Notes:

B8. YES, the various risk factors have been identified and written into the SOP pages 3-7 of 10. 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 is on-going.

9 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

B9. The OCC is increasing staff to address IMP, OQ, CRM, PAPEI, etc, while continuing with Standard, construction, and incident/accident inspections. John Harper was promoted in July, 2012 to schedule and coordinate these newer inspections and to be a source of management support. It is everyone's goal to shrink re-inspection intervals to 7 years or less for every type of inspection.

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



PART C - Program Performance

Points(MAX) Score

- 1 Was ratio of Total Inspection person-days to total person days acceptable? (Director of State Programs may modify with just cause) Chapter 4.3 (A12) 5 5
Yes = 5 No = 0

A. Total Inspection Person Days (Attachment 2):
1065.00

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):
220 X 7.69 = 1692.53

Ratio: A / B
1065.00 / 1692.53 = 0.63

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

Evaluator Notes:

C1. Yes. A=1065 person days. B=769 man years * 220 = 1691.8 person days. A/B= .6295 . .6295>.38, okay

- 2 Has each inspector and program manager fulfilled the T Q Training Requirements? (See Guidelines for requirements) Chapter 4.4 (A8-A11, G19) 5 5
Yes = 5 No = 0 Needs Improvement = 1-4

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|----|--------------------------------------------------------------------------------------------------------------|--------------------------------------|--------------------------|-----------------------------------------|
| a. | Completion of Required OQ Training before conducting inspection as lead? | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. | Completion of Required DIMP*/IMP Training before conducting inspection as lead? *Effective Evaluation CY2013 | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c. | Root Cause Training by at least one inspector/program manager | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d. | Note any outside training completed | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

C2. Yes, all inspectors & managers with 3+ years of service have passed all TSI core courses, and the new inspectors are taking courses and are scheduled for the rest. All Leads have the necessary courses.

- 3 Did state records and discussions with state pipeline safety program manager indicate adequate knowledge of PHMSA program and regulations? Chapter 4.1,8.1 (A5) 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

C3. Yes, The Program Managers show a professional knowledge of the regulations.

- 4 Did state respond to Chairman's letter on previous evaluation within 60 days and correct or address any noted deficiencies? (If necessary) Chapter 8.1 (A6-7) 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

C4. Yes, The OCC Chairman responded in 34 days. All 5 items were addressed.

- 5 Did State hold PHMSA TQ Seminar in Past 3 Years? Chapter 8.5 (A3) 2 2
Yes = 2 No = 0

Evaluator Notes:

C5. Yes. OCC uses an 18 month TQ schedule. The last Seminar was in November, 2011; the next one is scheduled for May, 2013; both in Tulsa.

- 6 Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1 (B3) 5 5
Yes = 5 No = 0 Needs Improvement = 1-4

Evaluator Notes:

C6. 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.

7	Did inspection form(s) cover all applicable code requirements addressed on Federal Inspection form(s)? Did State complete all applicable portions of inspection forms? Chapter 5.1 (B4-5) Yes = 2 No = 0 Needs Improvement = 1	2	2
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Evaluator Notes:

C7. Yes. OCC uses the current federal form supplemented with an addendum sheet.

8	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) Chapter 5.1 (B7) Yes = 1 No = 0	1	1
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Evaluator Notes:

C8. Yes. It was thought that there was no cast iron in the State; however 150 ft was found in OKC in July, 2012 and immediately abandoned. Detailed checks in the area found no additional cast iron. A regional review is now underway.

9	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) Chapter 5.1 (B8) Yes = 1 No = 0	1	1
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Evaluator Notes:

C9. Yes. It was thought that there was no cast iron in the State; however 150 ft was found in OKC in July, 2012 and immediately abandoned. Detailed checks in the area found no additional cast iron. A regional review is now underway.

10	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) Chapter 5.1 (B9) Yes = 1 No = 0	1	1
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Evaluator Notes:

C10. Yes, OCC queries the Operator, and addresses it during Standard and OQ inspections. OCC has created an addendum sheet to address this question.

11	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? Chapter 5.1 (B10,E5) Yes = 1 No = 0	1	1
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Evaluator Notes:

C11. Yes, this is part of standard inspections and Incident investigations.

12	Has the state reviewed Operator Annual reports, along with Incident/Accident reports, for accuracy and analyzed data for trends and operator issues? Data Initiative (G6-9,G16) Yes = 2 No = 0 Needs Improvement = 1	2	2
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Evaluator Notes:

C12. 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 16 years of annual report data.

13	Did state input all applicable OQ, IMP inspection results into federal database in a timely manner? This includes replies to Operator notifications into IMDB database. Chapter 5.1 (G10-12) Yes = 2 No = 0 Needs Improvement = 1	2	2
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Evaluator Notes:

C13. Yes, all of the IMP & OQ inspections for 2011 have been uploaded, typically within 60 days of the inspection. There

were no Operator notifications in 2011 that needed to be uploaded. The focus in 2011 was to continue to conduct Protocol 9 inspections in every Unit that had a standard inspection. There were some violations found during those Protocol 9 reviews.

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|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 14 | Has state confirmed intrastate transmission operators have submitted information into NPMS database along with changes made after original submission? (G14)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Evaluator Notes:

C14. Yes. It is a multiple year practice and it is now on the new Standard Inspection Form.

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|-----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 15 | Is the state verifying operators are conducting drug and alcohol tests as required by regulations? This should include verifying positive tests are responded to in accordance with program. 49 CFR 199 (I1-3)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Evaluator Notes:

C15. Yes. OCC uses Form 13 for each Standard Inspection Unit and Form 3.1.11 for HQ Plan Reviews.

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| 16 | Is state verifying operators OQ programs are up to date? This should include verification of any plan updates and that persons performing covered tasks (including contractors) are properly qualified and requalified at intervals determined in the operators plan. 49 CFR 192 Part N (I4-7)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Evaluator Notes:

C16. Yes, the federal Form is used, and the re-inspections are within the SOP inspection interval

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|-----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 17 | Is state verifying operator's gas transmission integrity management programs (IMP) are up to date? This should include a previous review of IMP plan, along with monitoring progress on operator tests and remedial actions. In addition, the review should take in to account program review and updates of operators plan(s). 49 CFR 192 Subpart O (I8-12)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Evaluator Notes:

C17. 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. The impact radii calculations and the HCA determinations have been verified during every GIMP review. All initial GIMP have been done and compliance with subpart O has been checked. Tests and remedial actions are being checked for compliance with their plan. 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.

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| 18 | Is state verifying operator's gas distribution integrity management Programs (DIMP)?
This should include a review of DIMP plans, along with monitoring progress. In addition, the review should take in to account program review and updates of operators plan(s). 49 CFR 192 Subpart P
Info Only = No Points | Info Only | Info Only |
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Evaluator Notes:

C18. NA for 2011. DIMP started in 2012. The federal forms and protocols are being used, The inspections will/are be uploaded into the database as soon as the database is fully functional.

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| 19 | Is state verifying operators Public Awareness programs are up to date and being followed. State should also verify operators have evaluated Public Awareness programs for effectiveness as described in RP1162. 49 CFR 192.616 (I13-16)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Evaluator Notes:

C19. Yes. have reviewed and resolved with the Operator all the Clearing House and CATS exceptions. Also through records review during Standard Inspections and providing instruction about it during the public awareness meetings that are conducted several times per year. Starting in 2011, PAPEI inspections were started in 2011. Present target for first round of PAPEI Inspections in 2014.

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|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 20 | Does the state have a mechanism for communicating with stakeholders - other than state pipeline safety seminar? (This should include making enforcement cases available to public). (G20-21)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Evaluator Notes:

C20. 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. 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.

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| 21 | Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.3 (B6)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

C21. Yes, Had 8 gas & 2 HL. SRCR are tracked similar to any other inspection, & updates are sent to the Feds.

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|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 22 | 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? (G13)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Evaluator Notes:

C22. Yes. 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.

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| 23 | Did the state participate in/respond to surveys or information requests from NAPS or PHMSA? (H4)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Evaluator Notes:

C23. Yes, OCC works with NAPS, TQ, NTSB, PHMSA, and is on various committees. Dennis Fothergill is on the NAPS Committee that asks these questions!!

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|-----------|--------------------------------------------|-----------|-----------|
| 24 | General Comments:
Info Only = No Points | Info Only | Info Only |
|-----------|--------------------------------------------|-----------|-----------|

Evaluator Notes:

C24 The rapid pace of the evolution and change of the Regulations is continuing, but the OCC is committed to meet those changes. Regulation demands and available manpower are regularly reviewed and applied for the most effective results and changes are reflected in the SOP. Staff has recently been increased by 2 FTE and a 3rd FTE is pending.

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

PART D - Compliance Activities

Points(MAX) Score

- 1** Does the state have written procedures to identify steps to be taken from the discovery to resolution of a probable violation? Chapter 5.1 (B12-14, B16, B1h) 4 4
Yes = 4 No = 0 Needs Improvement = 1-3
- a. Procedures to notify an operator (company officer) when a noncompliance is identified Yes ☒ No ☐ Needs Improvement ☐
- b. Procedures to routinely review progress of compliance actions to prevent delays or breakdowns Yes ☒ No ☐ Needs Improvement ☐

Evaluator Notes:

D1. Yes, in the Department Guidelines (SOP) pg 8 & 9 of 10, & the Commission Rules & Practice, Chapter 13, Part 3 Procedure.

- 2** Did the state follow compliance procedures (from discovery to resolution) and adequately document all probable violations, including what resolution or further course of action is needed to gain compliance? Chapter 5.1 (B11,B18,B19) 4 4
Yes = 4 No = 0 Needs Improvement = 1-3
- a. Were compliance actions sent to company officer or manager/board member if municipal/government system? Yes ☒ No ☐ Needs Improvement ☐

Evaluator Notes:

D2. Yes, the inspection reports, 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 (PLS-NG-11-600, PLS-NG-11-669, PLS-NG-11-088, PLS-NG-11-552, PLS-NG-11-205, PLS-HL-11-051, PLS-HL-11-044, PLS-HL-11-004) shows the records to be in compliance with the procedures. Yes, it was done & the mechanism is in the SOP, pg 9 of 10.

- 3** Did the state issue compliance actions for all probable violations discovered? (B15) 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

D3. Yes, 91 in 2011, 54 in 2010, 55 in 2009, 47 in 2008, 105 in 2007, & 87 in 2006.

- 4** Did compliance actions give reasonable due process to all parties? Including "show cause" hearing if necessary. (B17, B20) 2 2
Yes = 2 No = 0

Evaluator Notes:

D4. Yes, the mechanism is in the SOP, sec 165:20-13-15. Due process procedures are followed for all parties. In 2011 two contempt cases were processed; the Contempt ? Town of Freedom was processed to a Final Order and closed. The Contempt ? Enogex was processed to a Final Order and closed in 1st Qtr, 2012. Town of Freedom received a compliance order, and Enogex received a \$1000 fine. There were no actions in 2008, 2009, or 2010, & one action in 2007, to shut in a small town.

- 5** 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) (B27) 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

D5. 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 Contempt (Show Cause) Hearings.

- 6** Can the State demonstrate it is using their enforcement fining authority for pipeline safety violations? (new question) Info Only Info Only
Info Only = No Points

Evaluator Notes:

D6. Yes. OCC has a history of issuing occasional fines. They will start re-inserting a clause for subjecting the operator to civil penalties if they fail to comply with the original compliance action.

7 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

D7. OCC is well able to enforce the regulations. OCC recognizes that increased use of civil penalties will likely be needed.

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



PART E - Incident Investigations

Points(MAX) Score

- 1 Does state have adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports? And did state keep adequate records of Incident/Accident notifications received? Chapter 6 (A2,D1-3) 2 2

Yes = 2 No = 0 Needs Improvement = 1

- a. Acknowledgement of MOU between NTSB and PHMSA (Appendix D) Yes ☒ No ☐ Needs Improvement ☐
- b. Acknowledgement of Federal/State Cooperation in case of incident/accident (Appendix E) Yes ☒ No ☐ Needs Improvement ☐

Evaluator Notes:

E1. 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. Yes, the MOU between NTSB and OPS is understood, and OCC fully cooperates with NTSB. Yes, gas incidents are investigated and placed in the files. In addition, the incidents meeting State reporting criteria are in the files.

- 2 If onsite investigation was not made, did state obtain sufficient information from the operator and/or by other means to determine the facts to support the decision to not go on-site? Chapter 6 (D4) 1 1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

E2. Yes, In 2011, 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.

- 3 Were all incidents investigated, thoroughly documented, and with conclusions and recommendations? (D5) 3 3

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

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

Evaluator Notes:

E3. Yes, yes, yes, OCC uses the federal Form 11 for incident investigations. The events are documented and Appendix E is followed.

- 4 Did the state initiate compliance action for violations found during any incident/accident investigation? (D6) 1 1

Yes = 1 No = 0

Evaluator Notes:

E4. Yes, the SOP dictates action similar to any other violation.

- 5 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 report data from operators concerning incidents/accidents and investigate discrepancies) Chapter 6 (D7) 1 1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

E5. yes, OCC is a full partner with PHMSA and has assisted PHMSA in the past on interstate incidents/accidents to ensure that incident reports are accurate & updated, and the reports are reviewed for completeness & to ensure that a final report is submitted.

- 6 Does state share lessons learned from incidents/accidents? (sharing information, such as: at NAPS Region meetings, state seminars, etc) (G15) 1 1

Yes = 1 No = 0

Evaluator Notes:

E6. Yes, OCC makes a report during the SW Region NAPS Region Meeting, and responds as appropriate to email correspondence. In addition, lessons learned are shared at Safety Seminars, trade association meetings, and other training events.

7 General Comments:
Info Only = No Points

Info OnlyInfo Only

Evaluator Notes:

E7. In 2011, 4 of the 6 incidents/accident were due to tornado damage. The other two events were due to excavation damage as a result of mis-marking a pipeline and undiscovered internal corrosion that progressed to a leak.

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



PART F - Damage Prevention

Points(MAX) Score

- | | | | |
|---|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 1 | 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? NTSB (E1)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Evaluator Notes:

F1. 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.

- | | | | |
|---|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 2 | 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? (E2)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Evaluator Notes:

F2. Yes, it is part of the Standard Inspection Forms for Form 1, Form 2, & Form 3.

- | | | | |
|---|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 3 | Did the state encourage and promote practices for reducing damages to all underground facilities to its regulated companies? (i.e. such as promoting/adopting the CGA Best Practices encouraging adoption of the 9 Elements, etc.) (E3)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Evaluator Notes:

F3. Yes, OCC gives a One-Call & RP 1162 Seminar every 18 months and it includes T&Q Seminars. They also give a One-Call & RP 1162 Seminar in the annual Small Operator/Municipal presentations. OK requires that one call notifications be made, or Certified Projects be followed, or that pre-engineered & certified projects be followed as their means of enforcing Damage Prevention.

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|---|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 4 | Has the agency or another organization within the state collected data and evaluated trends on the number of pipeline damages per 1,000 locate requests? (This can include DIRT and other data shared and reviewed by the pipeline safety program) (E4,G5)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Evaluator Notes:

F4. Yes. OCC has required and received line locates, line hits, and line leaks from the One Call Center and all regulated operators. OCC is using spreadsheet analysis to learn that master meters have almost no risk of line hits. The study of line hits per thousand locates is interesting because the rate varies widely across the various classes of operators. The data includes regulated and non-regulated underground resources.

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

Evaluator Notes:

F5. OCC has been able to create a credible database and study by requiring the line locate, hit, and leak data. OCC continues to work toward achieving all 9 elements of Damage Prevention including effective civil penalties of excavators who violate the Damage Prevention regulations.

Total points scored for this section: 8
Total possible points for this section: 8

PART G - Field Inspections

Points(MAX) Score

- 1 Operator, Inspector, Location, Date and PHMSA Representative Info OnlyInfo Only
Info Only = No Points

Name of Operator Inspected:

Oklahoma Natural Gas, opid 14210, ONG Tulsa North Unit, Owasso Dist. System

Name of State Inspector(s) Observed:

Randy Snyder, Jim Reiling, Rick Matthews, Kelly Phelps

Location of Inspection:

5848 E15th St, Tulsa, OK 74112

Date of Inspection:

3/15-17/2012

Name of PHMSA Representative:

Patrick Gaume, State Liaison

Evaluator Notes:

G1. Oklahoma Natural Gas, opid 14210, ONG Tulsa North Unit, Owasso Dist. System, 5848 E15th St, Tulsa, OK 74112; 3/15-17/12; Randy Snyder, Jim Reiling, Rick Matthews, Kelly Phelps.

- 2 Was the operator or operator's representative notified and/or given the opportunity to be present during inspection? (F2) 1 1
Yes = 1 No = 0

Evaluator Notes:

G2. Yes; A minimum of 12 ONG Personnel participated in the inspection.

- 3 Did the inspector use an appropriate inspection form/checklist and was the form/checklist used as a guide for the inspection? (New regulations shall be incorporated) (F3) 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

G3. Yes, Used Form 2, Std Insp Rev 5/6/11 + OCC addendum sheet.

- 4 Did the inspector thoroughly document results of the inspection? (F4) 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

G4. YES.

- 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.) (F5) 1 1
Yes = 1 No = 0

Evaluator Notes:

G5. Yes. Half cell, regulator testing equipment, CGI and FI unit, Odorant tester, hand tools.

- 6 Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list) (F7) 2 2
Yes = 2 No = 0 Needs Improvement = 1
- | | |
|---------------------------|-------------------------------------|
| a. Procedures | <input checked="" type="checkbox"/> |
| b. Records | <input checked="" type="checkbox"/> |
| c. Field Activities | <input checked="" type="checkbox"/> |
| d. Other (please comment) | <input type="checkbox"/> |

Evaluator Notes:

G6. Yes, Procedures, Records, and Field.

- | | | | |
|---|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 7 | Did the inspector have adequate knowledge of the pipeline safety program and regulations? (Evaluator will document reasons if unacceptable) (F8)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Evaluator Notes:

G7. Yes, all three inspectors demonstrated a high level of competence.

- | | | | |
|---|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 8 | Did the inspector conduct an exit interview? (If inspection is not totally complete the interview should be based on areas covered during time of field evaluation) (F9)
Yes = 1 No = 0 | 1 | 1 |
|---|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Evaluator Notes:

G8. YES. reg stations are okay, no violations found, some recommendations; unpainted meter sets need attention, need to OQ the meter reader on what atmosphere corrosion really is, apparent lightning damage on a meter set regulator next to a chain link fence, reg station ? some short bolts found where the insulator pkg was installed, buried meter, another meter was nearly in ground contact, instance of a missing internal disc on a disconnect, natural force threat (flood debris on exposed span).

- | | | | |
|---|-------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 9 | During the exit interview, did the inspector identify probable violations found during the inspections? (if applicable) (F10)
Yes = 1 No = 0 | 1 | 1 |
|---|-------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Evaluator Notes:

G9. YES. reg stations are okay, no violations found, some recommendations; unpainted meter sets need attention, need to OQ the meter reader on what atmosphere corrosion really is, apparent lightning damage on a meter set regulator next to a chain link fence, reg station ? some short bolts found where the insulator pkg was installed, buried meter, another meter was nearly in ground contact, instance of a missing internal disc on a disconnect, natural force threat (flood debris on exposed span).

- | | | | |
|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|-----------|
| 10 | General Comments: What did the inspector observe in the field? (Narrative description of field observations and how inspector performed) Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices) Other.
Info Only = No Points | Info Only | Info Only |
|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|-----------|

- | | | |
|----|-------------------------------|-------------------------------------|
| 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 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 checked="" type="checkbox"/> |
| k. | Emergency Procedures | <input checked="" type="checkbox"/> |
| l. | Inspection of Right-of-Way | <input type="checkbox"/> |
| m. | Line Markers | <input checked="" type="checkbox"/> |
| n. | Liaison with Public Officials | <input type="checkbox"/> |
| o. | Leak Surveys | <input checked="" type="checkbox"/> |
| p. | MOP | <input type="checkbox"/> |
| q. | MAOP | <input checked="" type="checkbox"/> |
| r. | Moving Pipe | <input type="checkbox"/> |
| s. | New Construction | <input checked="" type="checkbox"/> |
| t. | Navigable Waterway Crossings | <input type="checkbox"/> |
| u. | Odorization | <input checked="" type="checkbox"/> |
| v. | Overpressure Safety Devices | <input checked="" type="checkbox"/> |
| w. | Plastic Pipe Installation | <input checked="" type="checkbox"/> |
| x. | Public Education | <input type="checkbox"/> |

- | | | |
|----|-----------------------------------|-------------------------------------|
| y. | Purging | <input type="checkbox"/> |
| z. | Prevention of Accidental Ignition | <input type="checkbox"/> |
| A. | Repairs | <input checked="" type="checkbox"/> |
| B. | Signs | <input checked="" type="checkbox"/> |
| C. | Tapping | <input type="checkbox"/> |
| D. | Valve Maintenance | <input type="checkbox"/> |
| E. | Vault Maintenance | <input type="checkbox"/> |
| F. | Welding | <input type="checkbox"/> |
| G. | OQ - Operator Qualification | <input type="checkbox"/> |
| H. | Compliance Follow-up | <input type="checkbox"/> |
| I. | Atmospheric Corrosion | <input checked="" type="checkbox"/> |
| J. | Other | <input type="checkbox"/> |

Evaluator Notes:

G10. CP readings, regulator stations, regulators, valves, above ground piping, pipe yard inventory and records, hydro test and air test records for pre-tested pipe, expiration dates for PE pipe, Abnormal operations (apparent evidence of a lightning strike on a meter set), residential and commercial meter sets, outside force threats (car barriers), screens and plugs on meter sets, exposed pipe, class 1, 2, & 3 leaks, signs & line markers, locks, site security, odorant test, exposed pipe, natural force event (flood debris), relief valves, relief valve checks, excavation site, one call verification.

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



PART H - Interstate Agent State (If Applicable)**Points(MAX) Score**

- | | | | |
|----------|---------------------------------------------------------------------------------------------------------|---|----|
| 1 | Did the state use the current federal inspection form(s)? (C1)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---------------------------------------------------------------------------------------------------------|---|----|

Evaluator Notes:

H1-8. NA not an interstate Agent Program.

- | | | | |
|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|----|
| 2 | Are results documented demonstrating inspection units were reviewed in accordance with "PHMSA directed inspection plan"? (C2)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|----|

Evaluator Notes:

H1-8. NA not an interstate Agent Program.

- | | | | |
|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|----|
| 3 | Did the state submit documentation of the inspections within 60 days as stated in its latest Interstate Agent Agreement form? (C3)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|----|

Evaluator Notes:

H1-8. NA not an interstate Agent Program.

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|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|----|
| 4 | Were 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.) (C4)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|----|

Evaluator Notes:

H1-8. NA not an interstate Agent Program.

- | | | | |
|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|----|
| 5 | Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? (C5)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|----|

Evaluator Notes:

H1-8. NA not an interstate Agent Program.

- | | | | |
|----------|-------------------------------------------------------------------------------------------------------------------------------------------|---|----|
| 6 | Did the state give written notice to PHMSA within 60 days of all probable violations found? (C6)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|-------------------------------------------------------------------------------------------------------------------------------------------|---|----|

Evaluator Notes:

H1-8. NA not an interstate Agent Program.

- | | | | |
|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------|---|----|
| 7 | Did the state initially submit documentation to support compliance action by PHMSA on probable violations? (C7)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------|---|----|

Evaluator Notes:

H1-8. NA not an interstate Agent Program.

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|----------|--------------------------------------------|--|--------------------|
| 8 | General Comments:
Info Only = No Points | | Info OnlyInfo Only |
|----------|--------------------------------------------|--|--------------------|

Evaluator Notes:

H1-8. NA not an interstate Agent Program.

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

PART I - 60106 Agreement State (If Applicable)**Points(MAX) Score**

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|----------|----------------------------------------------------------------------------------------------------------|---|----|
| 1 | Did the state use the current federal inspection form(s)? (B21)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|----------------------------------------------------------------------------------------------------------|---|----|

Evaluator Notes:

I.1-7. NA. not a 60106 Agreement Program

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|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|---|----|
| 2 | Are results documented demonstrating inspection units were reviewed in accordance with state inspection plan? (B22)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|---|----|

Evaluator Notes:

I.1-7. NA. not a 60106 Agreement Program

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|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|----|
| 3 | 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.) (B23)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|----|

Evaluator Notes:

I.1-7. NA. not a 60106 Agreement Program

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|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|----|
| 4 | Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? (B24)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|----|

Evaluator Notes:

I.1-7. NA. not a 60106 Agreement Program

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|----------|--------------------------------------------------------------------------------------------------------------------------------------------|---|----|
| 5 | Did the state give written notice to PHMSA within 60 days of all probable violations found? (B25)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--------------------------------------------------------------------------------------------------------------------------------------------|---|----|

Evaluator Notes:

I.1-7. NA. not a 60106 Agreement Program

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|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|----|
| 6 | Did the state initially submit adequate documentation to support compliance action by PHMSA on probable violations? (B26)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|----|

Evaluator Notes:

I.1-7. NA. not a 60106 Agreement Program

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

Evaluator Notes:

I.1-7. NA. not a 60106 Agreement Program

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