



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

1200 New Jersey Avenue SE  
Washington DC 20590

## 2009 Hazardous Liquid 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 -- Accident Investigations
- E -- Damage Prevention Initiatives
- F -- Field Inspection
- G -- PHMSA Initiatives - Strategic Plan
- H -- Miscellaneous
- I -- Program Initiatives



2009 Hazardous Liquid State Program Evaluation -- CY 2009  
Hazardous Liquid

**State Agency:** Oklahoma  
**Agency Status:**  
**Date of Visit:** 06/07/2010 - 06/11/2010  
**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:** Mr. Bob Anthony, Chairman  
**Agency:** Oklahoma Corporation Commission  
**Address:** 2101 N. Lincoln Blvd.  
**City/State/Zip:** Oklahoma City, Oklahoma 73105

**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 2009 (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.

**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**

<b>PARTS</b>	<b>Possible Points</b>	<b>Points Scored</b>
A General Program Qualifications	26	25
B Inspections and Compliance - Procedures/Records/Performance	25	25
C Interstate Agent States	0	0
D Accident 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
<b>TOTALS</b>	<b>100.5</b>	<b>99</b>
<b>State Rating</b> .....		<b>98.5</b>

# PART A - General Program Qualifications

Points(MAX) Score

1	<p>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</p> <p>Yes = 8 No = 0 Needs Minor Improvement = 3-7 Needs Major Improvement = 2</p> <ul style="list-style-type: none"> <li>a. State Jurisdiction and agent status over Hazardous Liquid and CO2 facilities (1) <input checked="" type="checkbox"/></li> <li>b. Total state inspection activity (2) <input checked="" type="checkbox"/></li> <li>c. Hazardous Liquid facilities subject to state safety jurisdiction (3) <input checked="" type="checkbox"/></li> <li>d. Hazardous Liquid pipeline incidents (4) <input type="checkbox"/></li> <li>e. State compliance actions (5) <input checked="" type="checkbox"/></li> <li>f. State record maintenance and reporting (6) <input checked="" type="checkbox"/></li> <li>g. State employees directly involved in the Hazardous Liquid pipeline safety program (7) <input checked="" type="checkbox"/></li> <li>h. State compliance with Federal requirements (8) <input checked="" type="checkbox"/></li> </ul>	8	7
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**SLR Notes:**

A.1 Mostly, 7 of 8 pts. Had an error in Attachment 4, item 1.d D---A second significant Haz Liq accident has been found that is State jurisdictional. Federal accident report 20090227 (no evidence of an NRC report) has been marked intrastate by TEPPCO, but TEPPCO did not report it to the OCC. 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---Yes. D----- No. Reported one & it should have been two. Missed incident report 20090227, NRC none. They were on-site for all State reportable or Federal reportable accidents in 2009. E---OK sent out 2 notices of non-compliance. Operators are petitioning that NOAs be used for modification of IMP, OQ, Standard, or other plans. OCC will likely change their enforcement procedures during 2010 to allow for the use of NOAs, & they did incorporate CFR 49.198 into their regulations effective July 1, 2009. Since 1987, the Policy had been that the only tool available is notices of non-compliance. The Pipeline Section started discussions in 2006 to consider NOAs. F---inspections are recorded as a paper record, electronic record, & the monitoring of record deadlines and submission is monitored by the Pipeline Section management. G---OCC had 12 positions total during 2009 to administer the Gas & Haz Liquid programs. Historical staffing for the Pipeline Section was 13 FTE, however one position was eliminated in 2008. In 2009, there were 12 authorized positions; they had 7.68 inspectors for gas, & 1.32 inspectors for Haz liquid, & 3.00 administrative staff. All inspectors with 3+ years are have received all TSI core courses, & the newer inspectors are being trained ASAP. H---For 2009, OCC is authorized to fully implement the Federal Program. OCC has adopted ?191, ?192, ?195, ?198, ?199, & Part 40. Excavators who are not operators have to make restitution for damage to the underground utility including collateral damage. They are also subject to civil suit. OCC changed their enforcement procedures effective July 1, 2009 to incorporate ?198 into their regulations.

2	<p>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 (accident criteria as referenced in 195.50? - Mechanism should include receiving "after hours" reports) (Chapter 6) Previous Question A.2</p> <p>Yes = 1 No = 0</p>	1	1
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**SLR Notes:**

A.2. OCC meets the Federal reporting requirements.

3	<p>Has the state held a pipeline safety T &amp; Q seminar(s) in the last 3 years? (NOTE: Indicate date of last seminar or if state requested seminar, but T&amp;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.5</p> <p>Yes = 2 No = 0</p>	2	2
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**SLR Notes:**

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

4	<p>Were pipeline safety program files well-organized and accessible?(NOTE: This also includes electronic files) (Chapter 5) Previous Question A.6</p> <p>Yes = 1 No = 0</p>	1	1
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**SLR Notes:**

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

5	<p>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.7</p> <p>Yes = 2 No = 0 Needs Improvement = 1</p>	2	2
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**SLR Notes:**

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



- 6** 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.9 1 1  
 Yes = 1 No = 0

**SLR Notes:**

A.6. Yes, The Chairman letter was sent within 60 days of receipt. It addressed Civil Penalties for excavation damage, loss of a position of Pipeline Staff, data driven inspections, and D&A inspections to verify that operators follow their procedures for positive drug tests.

- 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? (Chapter 8.1) Previous Question A.10 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.

## Personnel and Qualifications

- 8** Has each inspector fulfilled the 3 year T&Q training requirement? If No, has the state been granted a waiver regarding T&Q courses by the Associate Administrator for Pipeline Safety? (NOTE: If the State has new inspectors who have not attended all T&Q 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.11 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-T&Q training Activities Info Only Info Only  
 Info Only = No Points

For State Personnel:

A.9. State- All Inspectors are HAZWOPER certified, and in June, 2009, all inspectors participated in an accident/incident investigation course taught by Sammy Russo.

For Operators:

A.9. Operators ? 5 days per year, each inspector is required to provide training in the regulations to the operators.

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

A.9. 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, and in June, 2009, all inspectors participated in an accident/incident investigation course taught by Sammy Russo.

Operators ? 5 days per year, each inspector is required to provide training in the regulations to the operators.

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.13 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 03 & 05. The other inspectors with 3+ years have also been trained.

- 11** Did the lead inspectors complete all required T&Q Integrity Management (IMP) Courses/Seminars and CBT before conducting IMP Inspections? (Chapter 4.4.1) Previous Question A.14 1 1  
 Yes = 1 No = 0

**SLR Notes:**

A.11. IMP Leads are John Harper ('04) & Kelly Phelps ('05). They were trained in 2005- TSI course 297 and 2002- 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.14 5 5  
 Yes = 5 No = 0

A. Total Inspection Person Days (Attachment 2):

142.00

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

$220 \times 1.32 = 290.40$

Ratio: A / B

$142.00 / 290.40 = 0.49$

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

Points = 5

**SLR Notes:**

A.12 A=142 person days. B=1.32 man years \* 220 = 290.4 person days. A/B= .489 .489>.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 continue to be down one position. Staffing was at 13 through 2007. In November, 2007, an inspector resigned & that position has not been refilled. 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 is now 11. A job announcement is active.

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

Info Only = No Points

**SLR Notes:**

A.14. 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: 25  
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) (Chapter 5.1) Previous Question B.1 + Chapter 5 Changes 6.5 6.5  
 Yes = 6.5 No = 0 Needs Improvement = 50% Deduction
- a Standard Inspections (Including LNG) (Max points = 2) Yes  No  Needs Improvement
  - b IMP Inspections (Including DIMP) (Max points = .5) Yes  No  Needs Improvement
  - c OQ Inspections (Max points = .5) Yes  No  Needs Improvement
  - d Damage Prevention (Max points = .5) Yes  No  Needs Improvement
  - e On-Site Operator Training (Max points = .5) Yes  No  Needs Improvement
  - f Construction Inspections (Max points = .5) Yes  No  Needs Improvement
  - g Incident/Accident Investigations (Max points = 1) Yes  No  Needs Improvement
  - h Compliance Follow-up (Max points = 1) Yes  No  Needs Improvement

**SLR Notes:**

B.1. a, b, c, f, g, & h, 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. D. yes, Damage Prevention is part of the Std Insp and part of the Public Awareness Program, see SOP pg 6 of 10. E. yes, see SOP pg 7 of 10, also see questions A.3 & A.9.

- 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  No  Needs Improvement
  - b History of Operator/unit and/or location (including leakage , incident and compliance history) Yes  No  Needs Improvement
  - c Type of activity being undertaken by operator (construction etc) Yes  No  Needs Improvement
  - d For large operators, rotation of locations inspected Yes  No  Needs Improvement

**SLR Notes:**

B.2. yes, Items a,b,c, & d are all found in the SOP pages 3-7 of 10.

## 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.5 1 1  
 Yes = 1 No = 0

**SLR Notes:**

B.4. Yes, OCC uses the Federal Forms.

- 5** Did state complete all applicable portions of inspection forms? (Chapter 5.1 (3)) Previous Question B.6 1 1  
 Yes = 1 No = 0

**SLR Notes:**

B.5. Yes.

- 6** Did the state initiate appropriate follow-up actions to Safety Related Condition Reports? (Chapter 6.3) Previous Question B.7 0.5 0.5  
 Yes = .5 No = 0

**SLR Notes:**

B.6. Yes, had, 0 gas & 4 haz liq. SRCR are tracked similar to any other inspection, & updates are sent to the Feds.

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**7** Did the state review operator procedures for determining areas of active corrosion on liquid lines in sufficient detail? (NOTE: PHMSA representative to describe state criteria for determining areas of active corrosion) Previous Question B.8 .5 0.5  
Yes = .5 No = 0

SLR Notes:

B.7. Yes, it is part of the standard inspection and is reviewed on a Unit by Unit level.

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**8** Did the state adequately review for compliance operator procedures for abandoning pipeline facilities and analyzing pipeline accidents to determine their causes? (NOTE: PHMSA representative to describe state criteria for determining compliance with abandoning pipeline facilities and analyzing pipeline accidents to determine their causes) Previous Question B.9 .5 0.5  
Yes = .5 No = 0

SLR Notes:

B.8. Yes, accident and abandonment procedures are reviewed during Standard Inspections

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**9** Is the state aware of environmentally sensitive areas traversed by or adjacent to hazardous liquid pipelines? (reference Part 195, review of NPMS) Previous Question B.16 .5 0.5  
Yes = .5 No = 0

SLR Notes:

B.9. Yes, Inspectors are familiar with HCAs and USAs.

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**10** 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 195.402(c)(5)? Previous Question B.11 1 1  
Yes = 1 No = 0

SLR Notes:

B.10. Accident 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 accidents are followed up with on-site investigation.

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## Compliance - 60105(a) States

**11** Did the state adequately document sufficient information on probable violations? (Chapter 5.2) Previous Question B.13 1 1  
Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

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

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**12** 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 C(1).1 1 1  
Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

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

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**13** 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 C(1).2 1 1  
Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

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

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**14** 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 C(1).3 1 1  
Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

B.14. Yes, in SOP, Part 3 Procedure, & the Department Guidelines pg 8 of 9.

<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 C(1).4 Yes = 1 No = 0	1	1
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SLR Notes:

B.15. Yes, there were 2 Haz Liquid compliance actions in 2009 & all were issued within 60 days of the inspection completion.

<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 C(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 C(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 2009.

<b>18</b>	Did the state adequately document the resolution of probable violations? (Chapter 5.1 (6)) Previous Question C(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.

<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 C(1).8 Yes = .5 No = 0	.5	0.5
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SLR Notes:

B.19. Yes, 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 C(1).9 Yes = 1 No = 0 Needs Improvement = .5	1	1
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SLR Notes:

B.20. Yes, due process is afforded all.

## Compliance - 60106(a) States

<b>21</b>	Did the state use the current federal inspection form(s)? Previous Question C(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 C(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.





**23** 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 C(2).3  
 Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

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

**24** Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? Previous Question C(2).4  
 Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

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

**25** Did the state give written notice to PHMSA within 60 days of all probable violations found? Previous Question C(2).5  
 Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

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

**26** 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

SLR Notes:

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

**27** Part B: General Comments/Regional Observations  
 Info Only Info Only  
 Info Only = No Points

SLR Notes:

B.27. There is some concern about the work load on OCC Pipeline Safety staff. 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 2009 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, etc. We would appreciate your comments concerning this perceived manpower shortage.

Total points scored for this section: 25  
 Total possible points for this section: 25



# PART C - Interstate Agent States

Points(MAX) Score

**1** Did the state use an inspection form that was approved by the Regional Director? Previous Question C(3).1 1 NA  
Yes = 1 No = 0 Needs Improvement = .5

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 C(3).2 1 NA  
Yes = 1 No = 0 Needs Improvement = .5

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 C(3).3 1 NA  
Yes = 1 No = 0

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 C(3).4 1 NA  
Yes = 1 No = 0

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 C(3).5 1 NA  
Yes = 1 No = 0 Needs Improvement = .5

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 C(3).6 1 NA  
Yes = 1 No = 0

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 C(3).7 1 NA  
Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

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

**8** Part C: General Comments/Regional Observations Info Only Info Only  
Info Only = No Points

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 - Accident Investigations

Points(MAX) Score

**1** Are state personnel following the procedures for Federal/State cooperation in case of an accident? (See Appendix in "Guidelines for States Participating in the Pipeline Safety Program") (Chapter 6.1) Previous Question D.1  
 Yes = 1 No = 0 Needs Improvement = .5

**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.

**2** 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 D.2  
 Yes = .5 No = 0

**SLR Notes:**

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

**3** Did the state keep adequate records of accident notifications received? Previous Question D.3  
 Yes = 1 No = 0 Needs Improvement = .5

**SLR Notes:**

D.3. Yes, of every accident that was received.

**4** If an onsite investigation of an accident 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 D.4  
 Yes = 1 No = 0 Needs Improvement = .5

**SLR Notes:**

D.4. Yes, In 2009, Federally reportable accidents were investigated on-site. However the SOP provides for telephonic reporting and after-the-fact follow up.

**5** Were investigations thorough and conclusions and recommendations documented in an acceptable manner? Previous Question D.5, , comprehensive question worth 2 points total  
 Yes = 2 No = 0 Needs Improvement = 1

- a. Observations Yes  No  Needs Improvement
- b. Contributing factors Yes  No  Needs Improvement
- c. Recommendations to prevent recurrences where appropriate Yes  No  Needs Improvement

**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.

**6** Did the state initiate enforcement action for violations found during any accident investigation(s)? Previous Question D.6 Variation  
 Yes = 1 No = 0 Needs Improvement = .5

**SLR Notes:**

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

**7** Did the state assist region office by taking appropriate follow-up actions related to the operator accident (and forward to PHMSA within 10 Days per 195.58) 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 D.7/D.8 and A.4  
 Yes = .5 No = 0

**SLR Notes:**

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

**8** Part D: General Comments/Regional Observations Info Only Info Only  
 Info Only = No Points

**SLR Notes:**



D.8. There were no fatalities or injuries in 2009 due to reportable incident/accidents.

---

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.12<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.8<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. Yes, it is being done by Oklahoma One Call.

---

- |          |   |   |   |
|----------|---|---|---|
| <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 195.402 (c)(5)?<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:  
Enogex  
Name of State Inspector(s) Observed:  
Mike Reed  
Location of Inspection:  
Holdenville, Ok  
Date of Inspection:  
03/30/2010  
Name of PHMSA Representative:  
Don Martin

**SLR Notes:**

Vince Eitzen, Oklahoma Corporation Commission, conducted a standard inspection of Enogex's Line L 500, four miles of 2 inch (.154" wall X-42) HVL pipeline that runs between Wetumka Plant to Wetumka Loading Facility. The review of operation and maintenance procedures and records was conducted at Enogex's Holdenville Field Office in Holdenville, OK. Mike Reed, Jim Ross and Jeff Osborn represented Enogex during the inspection.

---

**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:**

The operator was notified of the inspection on December 3, 2009. The operator had three representatives present at 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 E.2 2 2  
Yes = 2 No = 0

**SLR Notes:**

Vince used the Federal Form 3 - Standard Inspection of a Liquid Pipeline Carrier, revised 3/23/2009; Operator Qualification Field Inspection Protocol Form, revised 03/23/2009; Drug and Alcohol Form 13, revised 3/23/2009. All forms were acceptable. Vince used the inspection form to progress through the pipeline safety requirements.

---

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

**SLR Notes:**

If no compliance issues were found on a regulatory requirement, the "Satisfactory" block was checked. If a regulatory requirement was not applicable, the "not applicable" block was checked and a description of why not applicable applied. No probable violations were found during the inspection. If a probable violation

---

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

**SLR Notes:**

Yes. The inspector reviewed the pipe to soil test equipment that the operator was using on this day to take rectifier and pipe to soil readings. The volt meter and half cell was proper for the test readings to be taken on this day.

---

**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:**

The inspector conducted a standard inspection of Enogex's operation and maintenance of a 2" Propane pipeline that was approximately four miles in length from a natural gas processing plant to a truck loading facility. The inspector included a review of the operator's operation and maintenance procedures during the inspection. The records portion of the inspection and further test readings taken in the field would continue the following day after this evaluation observation.

---

**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:**

The inspector was observed during one day of his inspection that would entail at least two days. On the day of the observation, the inspector reviewed operation and maintenance procedures and reviewed the testing of rectifiers and pipe to soil test points. The records review portion would continue the next day after the observation.

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

**SLR Notes:**

Yes. The inspector was well versed in the regulatory requirements of Parts 195 and 199. He has considerable operating and maintenance experience with a hazardous liquid pipeline operator prior to his employment with the Oklahoma Corporation Commission.

**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 E.10 1 1  
 Yes = 1 No = 0

**SLR Notes:**

Yes. The inspector provided a verbal summary of his inspection results for the day. He explained that he had additional reviews to complete the next day before he would conclude his inspection.

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

**SLR Notes:**

The inspector indicated that he had not concluded that there were probable violations identified during his inspection on this day. He stated he had a couple of items to investigate further before deciding if a non-compliance occurred. He stated he would communicate his findings upon the final exit interview.

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

**SLR Notes:**

The operator's technician took readings on a rectifier and pipe to soil test points. An OQ review was conducted on the task of rectifier readings.

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

**SLR Notes:**

There were no best practices observed that warrant communication with other state programs.

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

- a. Abandonment
- b. Abnormal Operations
- c. Break-Out Tanks
- d. Compressor or Pump Stations
- e. Change in Class Location
- f. Casings
- g. Cathodic Protection
- h. Cast-iron Replacement
- i. Damage Prevention
- j. Deactivation
- k. Emergency Procedures
- l. Inspection of Right-of-Way
- m. Line Markers



- n. Liaison with Public Officials
- o. Leak Surveys
- p. MOP
- q. MAOP
- r. Moving Pipe
- s. New Construction
- t. Navigable Waterway Crossings
- u. Odorization
- v. Overpressure Safety Devices
- w. Plastic Pipe Installation
- x. Public Education
- y. Purging
- z. Prevention of Accidental Ignition
- A. Repairs
- B. Signs
- C. Tapping
- D. Valve Maintenance
- E. Vault Maintenance
- F. Welding
- G. OQ - Operator Qualification
- H. Compliance Follow-up
- I. Atmospheric Corrosion
- J. Other

**SLR Notes:**

The operator's operation and maintenance procedures pertaining the items checked above were reviewed during the inspection observation of this evaluation. Cathodic protection, overpressure protection, right of way, signs, markers and atmospheric corrosion was checked in the field.

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

Info Only Info Only

Info Only = No Points

**SLR Notes:**

Vince Eitzer was the inspector that was observed during this portion of the evaluation. Vince was very thorough during his inspection on this day. Vince has a good working knowledge of pipeline safety regulatory requirements. He conducted himself in a professional manner, asked good questions and was respectful of the operator's representatives.

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. Mostly, the various risk factors have been identified and written into the SOP. The specific information has not yet been broken out and loaded into a database or other mechanism to formalize the review process. (I would have selected Needs Improvement for 1 pt if it had been an available score)

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

### SLR Notes:

G.3. 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

**4** 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.4. 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.

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

### SLR Notes:

G.5. 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.

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

### SLR Notes:

G.6. 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.

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

### SLR Notes:

G.7. Yes, Reportable accidents are investigated relative to minimizing future events, including those due to excavation damage.

**8** 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.8. 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.

---

**9** 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? .5 0.5  
Yes = .5 No = 0

**SLR Notes:**

G.9. Yes, all of the Standard and Protocol 9 OQ inspections for 2009 have been uploaded, typically within 60 days of the inspection. The focus in 2009 was to conduct Protocol 9 inspections in every Unit that had a standard inspection. There were no violations found during those Protocol 9 reviews.

---

**10** Did the State submit their replies into the Integrity Management Database (IMDB) in response to the Operators notifications for their integrity management program? .5 NA  
Yes = .5 No = 0

**SLR Notes:**

G.10. NA. For both GIMP & LIMP. In 2009 there were no replies for GIMP or LIMP

---

**11** 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.11. Yes, all inspections for 2009 and to date 2010 have been uploaded into IMDB. In 2009 most of the uploads were Protocol A or Protocol 1 reviews.

---

**12** Did the State use the Federal Protocols to conduct IMP Inspections? (If the State used an alternative inspection form(s) please provide information regarding alternative form(s)) Previous Question C(2).6 .5 0.5  
Yes = .5 No = 0

**SLR Notes:**

G.12. YES, OCC uses the federal forms and protocols for IMP and all other inspections.

---

**13** 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.13. Yes. John Harper is the self appointed lead on this requirement. He & Kelly Phelps are motivating the entire inspection staff to direct most Operators to conform with NPMS requirements.

---

## Accident/Incident Investigation Learning and Sharing Lessons Learned

**14** Has state shared lessons learned from incidents/accidents? (i.e. NAPSRS meetings and communications) .5 0.5  
Yes = .5 No = 0

**SLR Notes:**

G.14. Yes, OCC makes a report during the SW Region NAPSRS Meeting, and responds as appropriate to email correspondence.

---

**15** Does the State support data gathering efforts concerning accidents? (Frequency/Consequence/etc) .5 0.5  
Yes = .5 No = 0

**SLR Notes:**

G.15. Yes, reports are received, followup 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.

---

**16** Does state have incident/accident criteria for conducting root cause analysis? Info Only Info Only  
Info Only = No Points

**SLR Notes:**

G.16. OCC does not have a criteria for a formal Root Cause Analysis at this time. All 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.

---

**17** Does state conduct root cause analysis on incidents/accidents in state? Info Only Info Only  
Info Only = No Points

**SLR Notes:**

G.17. OCC does not have a formal Root Cause Analysis at this time. All 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 starting to use the DIRT Form.

---

**18** Has state participated on root cause analysis training? (can also be on wait list) .5 0.5  
No = 0 Yes = .5

SLR Notes:

G.18. Not yet but the whole pipeline staff are on a wait list. (Points are awarded).

---

## Transparency - Communication with Stakeholders

**19** 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.19. 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.

---

**20** Does state share enforcement data with public? (Website, newsletters, etc.) .5 0.5  
Yes = .5 No = 0

SLR Notes:

G.20. 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

---

**21** Part G: General Comments/Regional Observations Info Only Info Only  
Info Only = No Points

SLR Notes:

G.21. 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**

- 
- 1** What were the major accomplishments for the year being evaluated? (Describe the accomplishments, NAPSR .5 0.5  
Activities and Participation, etc.) Previous Question A.15  
Yes = .5 No = 0

**SLR Notes:**

H.1. In 2009 OCC participated on 4 NAPSRS Committees & was proposed for a fifth committee. Mr. Fothergill served on the National Board and served as the Chairman of the SW Region NAPSRS. OCC also supplies four man-weeks of associate staff to T&Q 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.

---

- 2** What legislative or program initiatives are taking place/planned in the state, past, present, and future? (Describe .5 0.5  
initiatives (i.e. damage prevention, jurisdiction/authority, compliance/administrative, etc.) A.16  
Yes = .5 No = 0

**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 than the Federal Regulations, and to implement all 9 elements of the 2006 PIPES Act.

---

- 3** Any Risk Reduction Accomplishments/Projects? (i.e. Replacement projects, bare steel, third-party damage .5 0.5  
reductions, HCA's/USA mapping, internal corrosion, etc.)  
Yes = .5 No = 0

**SLR Notes:**

H.3. Yes, OCC is in its 6th 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.

---

- 4** Did the state participate in/respond to surveys or information requests from NAPSRS or PHMSA? 1 1  
Yes = 1 No = 0

**SLR Notes:**

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

---

- 5** Sharing Best Practices with Other States - (General Program) .5 0.5  
Yes = .5 No = 0

**SLR Notes:**

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

---

- 6** Part H: General Comments/Regional Observations Info Only Info Only  
Info Only = No Points

**SLR Notes:**

H.6. In 2009 OCC participated on 4 NAPSRS Committees & was proposed for a fifth committee. Mr. Fothergill served on the National Board and served as the Chairman of the SW Region NAPSRS. OCC also supplies four man-weeks of associate staff to T&Q 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.

---

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 2009 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 2009 OCC started demanding MIS data from all operators and is incorporating the MIS demand into its state regulations.

### 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 2009 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.

### Hazardous Liquid Pipeline Integrity Management (49 CFR Part 195.452)

- |          |   |   |   |
|----------|---|---|---|
| <b>8</b> | Has the state verified that all operators with hazardous liquid pipelines have adopted an integrity management program (IMP)?<br>Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

SLR Notes:

I.8. Yes, all Haz Liq Operators have been contacted. All Haz Liq Operators have either declared they have prepared a LIMP program or declared they have no USAs. Every Haz Liq Operator with an identified USA have received a full LIMP Inspection. The inspections have been uploaded into the fed database. All Haz Liq Operator Protocol 1 have been reviewed.

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

SLR Notes:

I.9. Yes, the high consequence areas and the USA determinations have been verified during every LIMP review

---

**10** Has the state reviewed operator IMPs for compliance with 195.452? .5 0.5  
Yes = .5 No = 0

SLR Notes:

I.10. Yes, all initial LIMP have been done and is in compliance with 195.452.

---

**11** Is the state monitoring operator progress on the inspections, tests and remedial actions required by the operator's IMP, which includes the manner and schedule called for in its IMP? .5 0.5  
Yes = .5 No = 0

SLR Notes:

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

---

**12** Is the state verifying operators are periodically examining their hazardous liquid pipelines for the appearance of new HCAs? .5 0.5  
Yes = .5 No = 0

SLR Notes:

I.12. Yes, all Haz Liq Operators have had one or more LIMP inspections, and they are follow up reviewed relative to what was found during the prior inspections.

---

### Public Awareness (49 CFR Section 195.440)

**13** 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)? .5 0.5  
Yes = .5 No = 0

SLR Notes:

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

---

**14** Has the state reviewed the content of these programs for compliance with 195.440 (by participating in the Clearinghouse or by other means)? .5 0.5  
Yes = .5 No = 0

SLR Notes:

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

---

**15** Is the state verifying that operators are conducting the public awareness activities called for in its program? .5 0.5  
Yes = .5 No = 0

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.

---

**16** Is the state verifying that operators have evaluated their public awareness programs for effectiveness as described in RP1162? Info Only Info Only  
Info Only = No Points

SLR Notes:

I.16. In Progress: OCC has received draft #2 of the Federal Public Awareness Program (PAP) Enforcement Guidance. OCC will inspect in accordance with the guidelines.

---

**17** Part I: General Comments/Regional Observations Info Only Info Only  
Info Only = No Points

SLR Notes:

I.17. OCC has an active D&A inspection program, is current with OQ inspections, is current with LIMP inspections, and has done all of the Public Awareness reviews.

---

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

