



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

1200 New Jersey Avenue SE
Washington DC 20590

2009 Natural Gas State Program Evaluation

for

ARKANSAS OIL AND GAS COMMISSION

Document Legend

PART:

- O -- Representative Date and Title Information
- A -- General Program Qualifications
- B -- Inspections and Compliance - Procedures/Records/Performance
- C -- Interstate Agent States
- D -- Incident Investigations
- E -- Damage Prevention Initiatives
- F -- Field Inspection
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2009 Natural Gas State Program Evaluation -- CY 2009
Natural Gas

State Agency: Arkansas

Agency Status:

Date of Visit: 07/12/2010 - 07/16/2010

Agency Representative: Gary Looney, Assistant Director

PHMSA Representative: Patrick Gaume, State Liaison

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

Name/Title: Chad White, Chairman

Agency: Arkansas Oil and Gas Commission

Address: PO Box 634

City/State/Zip: Magnolia, Arkansas 71754

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 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

PARTS

Possible Points Points Scored

A	General Program Qualifications	19	18
B	Inspections and Compliance - Procedures/Records/Performance	22	22
C	Interstate Agent States	0	0
D	Incident Investigations	0.5	0.5
E	Damage Prevention Initiatives	7	7
F	Field Inspection	12	12
G	PHMSA Initiatives - Strategic Plan	3	3
H	Miscellaneous	3	2.5
I	Program Initiatives	3.5	3

TOTALS **70** **68**

State Rating **97.1**

PART A - General Program Qualifications

Points(MAX) Score

- | | | | |
|----------|--|-------------------------------------|---|
| 1 | 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
Yes = 8 No = 0 Needs Minor Improvement = 3-7 Needs Major Improvement = 2 | 8 | 8 |
| a. | State Jurisdiction and agent status over gas facilities (1) | <input checked="" type="checkbox"/> | |
| b. | Total state inspection activity (2) | <input checked="" type="checkbox"/> | |
| c. | Gas facilities subject to state safety jurisdiction (3) | <input checked="" type="checkbox"/> | |
| d. | Gas pipeline incidents (4) | <input checked="" type="checkbox"/> | |
| e. | State compliance actions (5) | <input checked="" type="checkbox"/> | |
| f. | State record maintenance and reporting (6) | <input checked="" type="checkbox"/> | |
| g. | State employees directly involved in the gas pipeline safety program (7) | <input checked="" type="checkbox"/> | |
| h. | State compliance with Federal requirements (8) | <input checked="" type="checkbox"/> | |

SLR Notes:

A.1. Yes, See Pipeline Safety 2010 Natural Gas Certification for AOGC. Also see Arkansas Code Annotated (ACA) 15-71-110. Item A.1.e - Three NOV were issued that addressed about 30 compliance actions. Future attachment 5s will count compliance actions to be consistent with other State partner Programs.

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

SLR Notes:

A.2. Yes. The regulations are created and the internal program is in place. There were no reportable incidents in 2009. This was an item discussed with the Operators.

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

SLR Notes:

A.3. NA, New Program. yes, through APSC. AOGC will participate in the seminars with APSC. The next Seminar is scheduled for August 10-11, 2010.

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

SLR Notes:

A.4. Yes. The entire file set fits within a single file box plus some files on the computer.

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

SLR Notes:

A.5. Yes, the AOGC is a mature state agency and has demonstrated excellent administrative skills to set up this new program. Also 7 TQ courses were completed through 2009.

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|----------|---|---|---|
| 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.8
Yes = 1 No = 0 | 1 | 0 |
|----------|---|---|---|

SLR Notes:

A.6. No. The response is dated July 6, 2010, more than 6 months after the Chairman letter was sent.

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

Yes = 1 No = 0

SLR Notes:

A.7. Yes, all 8 questions were addressed. Civil penalties for excavation will be a continuing problem. The Attorney General has authority over excavators and it is up to the Attorney General to penalize them or not. However, a law does exist.

Personnel and Qualifications

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

SLR Notes:

A.8. NA, This is only the second year of being a State partner. They have started attending T&Q courses and are registered for the rest.

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|----------|---|-----------|-----------|
| 9 | Brief Description of Non-TQ training Activities: | Info Only | Info Only |
|----------|---|-----------|-----------|
- Info Only = No Points
- For State Personnel:
State personnel: AOGC personnel watched the webcast of the Public Awareness Workshop in Houston 6/30/09 +-.
For Operators:
Operators: none
- For Non-Operator Entities/Parties, Information Dissemination, Public Meetings:
Non-operators: none.

SLR Notes:

A.9. Some.
State personnel: AOGC personnel watched the webcast of the Public Awareness Workshop in Houston 6/30/09+-.
Operators: none
Non-operators: none.

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

SLR Notes:

A.10. NA, TQ courses are not completed yet. Is a new program.

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

SLR Notes:

A.11. NA, NO plans to do IMP inspections but they are likely finding Transmission lines which will require training in OQ and IMP.

- | | | | |
|-----------|---|---|---|
| 12 | Was the ratio acceptable of Total inspection Person-days to Total Person-days charged to the program by state inspectors? (Region Director may modify points for just cause) (Chapter 4.3) Previous Question B.12 | 5 | 5 |
|-----------|---|---|---|
- Yes = 5 No = 0
- A. Total Inspection Person Days (Attachment 2):
10.00
- B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):
220 X 0.03 = 5.50
- Ratio: A / B
10.00 / 5.50 = 1.82
- If Ratio >= 0.38 Then Points = 5, If Ratio < 0.38 Then Points = 0
Points = 5

SLR Notes:

A.12. Yes. 12 inspection days & 6.6 inspection days charged to the program is 1.82 & is >.38.

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. A second part-time inspector has been added to the program.

14	Part-A General Comments/Regional Observations	Info Only Info Only
	Info Only = No Points	

SLR Notes:

A.14. This evaluation addresses 2009, which was the second year of the program partnership. T&Q Training and development of the Program Manual is well underway.

Total points scored for this section: 18
Total possible points for this section: 19



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

Points(MAX) Score

Inspection Procedures

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

SLR Notes:

B.1. Yes for A, D, G, & H. Items B & C are NA, and not identified to be part of the program. Items E & F are NA, were not part of the program in 2009. It is observed that provisions for on-site training and conducting construction inspections may need to be developed at a future date. I used NI to indicate NA because NA is not available. The proper score should be 4.5 pts out of 4.5 possible pts.

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 Yes = 2 No = 0 Needs Improvement = 50% Deduction	2	2
a	Length of time since last inspection	Yes <input checked="" type="radio"/> No <input type="radio"/>	Needs Improvement <input type="radio"/>
b	History of Operator/unit and/or location (including leakage , incident and compliance history)	Yes <input checked="" type="radio"/> No <input type="radio"/>	Needs Improvement <input type="radio"/>
c	Type of activity being undertaken by operator (construction etc)	Yes <input checked="" type="radio"/> No <input type="radio"/>	Needs Improvement <input type="radio"/>
d	For large operators, rotation of locations inspected	Yes <input checked="" type="radio"/> No <input type="radio"/>	Needs Improvement <input type="radio"/>

SLR Notes:

B.2. Yes for A & D. B & C have not been addressed. With only 7 very small operators there is not any need for a selection process.

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 Yes = 2 No = 0	2	2
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SLR Notes:

B.3. Yes, Every Operator that has been found to have jurisdictional pipe was inspected in 2009.

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

B.4. Yes, use the Fed Forms.

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

B.5. No, not quite, but points are awarded. A couple sections were missed on the Hawk Field Services, LLC inspection. It likely won't happen again. Those items will be specifically addressed on the 2010 inspection, and as it has been less than two years since the last inspection, that action will be sufficient.

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

B.6. NA, none.

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

SLR Notes:

B.7. NA, no cast iron pipe

8	Did the state review operator procedures for surveillance of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leakage history, or other unusual operating maintenance condition? (Note: See GPTC Appendix G-18 for guidance) (NTSB) Previous Question B.8	.5	NA
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Yes = .5 No = 0

SLR Notes:

B.8. NA, no cast iron pipe

9	Did the state review operator emergency response procedures for leaks caused by excavation damage near buildings and determine whether the procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings Refer to 4/12/01 letter from PHMSA in response to NTSB recommendation P-00-20 and P-00-21? (NTSB) Previous Question B.9	.5	NA
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Yes = .5 No = 0

SLR Notes:

B.9. NA, no jurisdictional leaks in 2008.

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 192.617? (NTSB) Previous Question B.10	1	NA
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Yes = 1 No = 0

SLR Notes:

B.10. NA, none, this is a new program.

Compliance - 60105(a) States

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

SLR Notes:

B.11. Yes, all inspections, documentations, letters, etc are in the Operator file.

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 D(1).1	1	1
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Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

B.12. Yes. AOGC has statutes, rules and procedures. They send notices to the regulated entity's representative as reported on the AOGC Form 1 Organization Report and also to Corporate Officers per PHMSA Guidelines.

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 D(1).2	1	1
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Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

B.13. Yes, AOGC has internal procedures and Commission rules. See AOGC Rule A-5, & also A-2 & A-3

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

SLR Notes:

B.14. Yes, AOGC has internal procedures and Commission rules. See AOGC Rule A-5.

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

B.15. Yes, the inspection results and the notification letters are in agreement. All inspection Unsatisfactory findings are included in the notification letters.

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

B.16. Yes, File review shows that AOGC has followed its own procedures and Commission rules. See AOGC Rule A-5, & also A-2 & A-3.

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

B.17. Yes, Any penalty requires a Hearing. AOGC has not needed to demand a show cause hearing with an Operator relative to a jurisdictional pipeline. The procedures and program are in place. See AOGC Rules A-2 & A-3.

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

B.18. Yes, in 2009 there were three processed NOV, and they were resolved by Operator response within the required time frames. The Inspection record, Operator notification, and Operator response are all in the files.

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

B.19. Yes, They send notices to the regulated entity's representative as reported on the AOGC Form 1 Organization Report and also to Corporate Officers per PHMSA Guidelines.

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

B.20. Yes, Per AOGC Rule A-5, & also A-2 & A-3.

Compliance - 60106(a) States

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

B.21-26. NA, AOGC is a 60105(a) Partner.

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

B.21-26. NA, AOGC is a 60105(a) Partner.

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

SLR Notes:

B.21-26. NA, AOGC is a 60105(a) Partner.

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|--|---|---|----|
| 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 D(2).4 | 1 | NA |
| <small>Yes = 1 No = 0 Needs Improvement = .5</small> | | | |

SLR Notes:

B.21-26. NA, AOGC is a 60105(a) Partner.

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

SLR Notes:

B.21-26. NA, AOGC is a 60105(a) Partner.

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

SLR Notes:

B.21-26. NA, AOGC is a 60105(a) Partner.

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|--------------------------------------|--|-----------|-----------|
| 27 | Part B: General Comments/Regional Observations | Info Only | Info Only |
| <small>Info Only = No Points</small> | | | |

SLR Notes:

B.27. The fact that AOGC is a mature regulatory body is apparent. They are a new State Partner but they are very experienced in performance of inspections for compliance with regulations.

Total points scored for this section: 22
Total possible points for this section: 22



PART C - Interstate Agent States

Points(MAX) Score

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

SLR Notes:

C.1-8. NA, AOGC is not an Interstate Agent Program.

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

SLR Notes:

C.1-8. NA, AOGC is not an Interstate Agent Program.

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

SLR Notes:

C.1-8. NA, AOGC is not an Interstate Agent Program.

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

SLR Notes:

C.1-8. NA, AOGC is 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? Previous Question D(3).5
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

SLR Notes:

C.1-8. NA, AOGC is not an Interstate Agent Program.

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

C.1-8. NA, AOGC is not an Interstate Agent Program.

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

SLR Notes:

C.1-8. NA, AOGC is not an Interstate Agent Program.

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

SLR Notes:

C.1-8. NA, AOGC is not an Interstate Agent Program.

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

PART D - Incident Investigations

Points(MAX) Score

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

SLR Notes:

D.1. NA, new program ? discussed chapter 6.1 of State Guidelines, and there have been no accidents since AOGC became a State Partner.

- 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 E.2 .5 .5
Yes = .5 No = 0

SLR Notes:

D.2. Yes, Appendix D has been reviewed and understood.

- 3** Did the state keep adequate records of incident notifications received? Previous Question E.3 1 NA
Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

D.3. NA, none, new program.

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

SLR Notes:

D.4. NA, none, plan to do on-site investigations.

- 5** Were investigations thorough and conclusions and recommendations documented in an acceptable manner? Previous Question E.5, comprehensive question worth 2 points total 2 NA
Yes = 2 No = 0 Needs Improvement = 1
- a. Observations and Document Review 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. NA, none, they will use Fed Forms and follow Fed guidelines

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

SLR Notes:

D.6. NA, none.

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

SLR Notes:

D.7. NA, none.

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

SLR Notes:

D8. NA, this is an established State Agency starting a new program. They have the resources necessary to perform incident investigations.

Total points scored for this section: 0.5
Total possible points for this section: 0.5



PART E - Damage Prevention Initiatives

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? Previous Question B.11
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

SLR Notes:

E.1. Yes, and it is on the Standard Inspection addendum sheet

- | | | | |
|----------|--|---|---|
| 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? New 2008
Yes = 2 No = 0 | 2 | 2 |
|----------|--|---|---|

SLR Notes:

E.2. Yes, it is in the Std Insp Form, under Damage Prevention.

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

SLR Notes:

E.3. Yes, AOGC has a One-Call link on its web site. It is addressed in the every 3rd year T&Q Seminars and AOGC will co-sponsor the seminars with APSC. It is reviewed during every Standard Inspection. In '08 AOGC has supported efforts to establish an Arkansas CGA Regional Partnership. Specifically AOGC has supported One-Call efforts by encouraging all E&P operators to become One-Call members. AOGC has made One-Call membership required for operators of any natural gas line (including flow-lines, gathering lines, and other) that is within any city limits. They also recognize that enforcement has not been effectively addressed.

- | | | | |
|----------|---|---|---|
| 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? New 2008
Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

SLR Notes:

E.4. Yes, ARKUPS, the pipe locating service of AR One-Call tracks the number of locates per damage.

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

SLR Notes:

E.5. NA, there were no reportable incidents in 2009. None of the 7 Operators have had any line hits due to excavation for their jurisdictional pipe. This question has been added onto the Std Insp addendum sheet effective 7/13/10.

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

SLR Notes:

E.6. AOGC supports Damage Prevention initiatives. They have nothing in place to evaluate one-call tickets and excavation hits, however there have been none on jurisdictional pipe to date. They also have no enforcement power over excavators concerning excavation damage.

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

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:

Chesapeake Midstream Operating Inc opid - 31703

Name of State Inspector(s) Observed:

Gary Looney, Kelly Hurt

Location of Inspection:

Chesapeake Midstream office at 1686 Letona Road, Searcy, AR 72143

Date of Inspection:

7/14-15/2010

Name of PHMSA Representative:

Patrick Gaume

SLR Notes:

F.1. Chesapeake Midstream Operating Inc opid - 31703

Gary Looney, Kelly Hurt

Chesapeake Midstream office at 1686 Letona Road, Searcy, AR 72143

7/14-15/2010

Patrick Gaume

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

SLR Notes:

F.2. Yes, They were notified and scheduled in advance, it was held at the Operator's office, & 5 Operator personnel participated in the inspection.

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

SLR Notes:

F.3. Yes, it was a standard inspection based on the Federal Gas Transmission Inspection Form.

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

SLR Notes:

F.4. Yes, on the inspection form.

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

SLR Notes:

F.5. Yes.

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

SLR Notes:

F.6. Yes, a special Standard Inspection for a type A gathering line, focusing on records and field inspections.

7 Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list) New 2008, comprehensive question worth 2 points total 2 2
Yes = 2 No = 0 Needs Improvement = 1

a. Procedures

☐

b. Records

☒

- c. Field Activities/Facilities ☒
- d. Other (Please Comment) ☐

SLR Notes:

F.7. Yes, Mr. Looney & Kelly Hert conducted a special Std Inspection which included limited procedures, records, and Field inspections. (Procedures had been done in 2009)

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

SLR Notes:

F.8. Yes, his inspection was detailed and in accordance with the regulations, and his conduct was professional.

- 9** Did the inspector conduct an exit interview? (If inspection is not totally complete the interview should be based on areas covered during time of field evaluation) Previous Question F.10 1 1
Yes = 1 No = 0

SLR Notes:

F.9. Yes.

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

SLR Notes:

F.10. Yes. Mr. Looney conducted; - one field issue: cathodic protection- one low cp area at a valve riser. Records issues: verify effectiveness of training & procedures (192.615 b2 & b3), discussed needing improved records relative to Public Awareness public contacts for those residents along the regulated pipeline. 192.453 procedures are not specific on what qualifications are required to be CP qualified.

- 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:

F.11. signs, markers, emergency call number, bolts & threads, atmospheric corrosion, valve operation, valve rating against MOP, locks and valve protection, weather protection on relief valves, relief valve identification, its pressure setting, & its frequency of inspection. pipe supports, valve identification, correlation of valves to valve inspection records, checked hard to reach areas for adequacy of paint job, rectifier, test lead conditions and locations, vegetation along the ROW, road crossings, confirmed corrosion coupon placement, CP readings, Observed general condition of facilities.

- 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:

F.12. Same as last year: attention to detail usually yields results. Last year found mis-identified valves while attempting to compare valves with valve records.

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

SLR Notes:

F.13. Yes, Field review included items e, i, k, l, m, p, v, B, D, I.

14 Part F: General Comments/Regional Observations

Info Only Info Only

Info Only = No Points

SLR Notes:

F.14 On July 14-15, 2010, Mr. Gary Looney & Mrs. Kelly Hert performed a Special Standard Inspection of a 12" Type A Gas Gathering Pipeline Operated by Chesapeake Midstream at Searcy, AR. The inspection was a special inspection and included review of Records and an inspection of the physical facility. This was a follow up Inspection of a newly jurisdictional pipeline as the Procedures had been inspected in 2009. Mr. Looney and Mrs. Hert conducted the inspection in a competent, courteous, and professional manner.

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 NA

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. NA, AOGC's partnership plan in 2009 was to address gathering lines only with the expectation that they would be Type B Gathering Lines. The small count and short distance of the jurisdictional lines found makes this question wholly not applicable.

2 Are inspection units broken down appropriately? (see definitions in Guidelines) .5 0.5

Yes = .5 No = 0

SLR Notes:

G.2. Yes.

3 Consideration of operators DIMP Plan? (if available and pending rulemaking) Info Only Info Only

Info Only = No Points

SLR Notes:

G.3. NA, no distribution systems

4 Does state inspection process target high risk areas? .5 NA

Yes = .5 No = 0

SLR Notes:

G.4. NA, the entire group of jurisdictional lines is short and small.

Use of Data to Help Drive Program Priority and Inspections

5 Does state use data to analyze effectiveness of damage prevention efforts in the state? (DIRT or other data, etc) .5 NA

Yes = .5 No = 0

SLR Notes:

G.5. NA, no perceived applicability to use DIRT at this time. If there is ever a line hit this question will be re-addressed.

6 Has state reviewed data on Operator Annual reports for accuracy? .5 0.5

Yes = .5 No = 0

SLR Notes:

G.6. Yes, one operator has more than a mile of regulated pipe and that annual report is reviewed. It is addressed in the SOP and the regulations.

7 Has state analyzed annual report data for trends and operator issues? .5 NA

Yes = .5 No = 0

SLR Notes:

G.7. NA, only one annual report has been received. They will start being analyzed when there will be value in doing so.

8 Has state reviewed data on Incident/Accident reports for accuracy? .5 NA

Yes = .5 No = 0

SLR Notes:

G.8. NA, there have been no incident reports

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

SLR Notes:

G.9. NA, new program, there is little if any data available to evaluate

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

SLR Notes:

G.10. NA, OQ is not part of Gathering. Will reconsider when Transmission is identified.

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

SLR Notes:

G.11. NA, IMP is not part of Gathering. Will reconsider when Transmission is identified.

12	Have the IMP Federal Protocol forms been uploaded to the IMDB? Previous Question B.17	.5	NA
	Yes = .5 No = 0		

SLR Notes:

G.12. NA, none

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

SLR Notes:

G.13. NA, new program, there is little if any data available to evaluate for plastic pipe. There have been no plastic pipe incidents or identified defects since the State Partnership started on 01/01/2008. (monitor this question for future applicability)

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

SLR Notes:

G.14. NA, not yet, E&P Operators have not been confirmed to have Transmission Lines in AR

Accident/Incident Investigation Learning and Sharing Lessons Learned

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

SLR Notes:

G.15. NA, there have been no jurisdictional incidents

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

SLR Notes:

G.16. Yes, however there is no data to collect

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

SLR Notes:

G.17. No, not yet.

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



SLR Notes:

G.18. NA, there have been no incidents

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

SLR Notes:

G.19. No, not yet but points are awarded. No one has attended the Root Cause Analysis Class. We note AOGC's objection that the Root Cause Class is an elective class only. We encourage at least one Inspector take the class.

Transparency - Communication with Stakeholders

20	Other than pipeline safety seminar does State communicate with stakeholders? (Communicate program data, pub awareness, etc.)	.5	0.5
	Yes = .5 No = 0		

SLR Notes:

G.20. Yes, AOGC is pushing Damage Prevention and One-call in almost every contact with E&P operators. AOGC issued approved work shirts that have One-Call info and the 811 logo

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

SLR Notes:

G.21. Yes, all Hearings are public information and on the web site. Notices are public information too, but they have to be requested.

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

SLR Notes:

G.22. This is a new, small, and limited program for AOGC. It is unlikely that there will be enough data to perform detailed analysis for risk based inspections, or to evaluate damage Prevention in the State, or to have enough incidents to share lessons learned. AOGC is transparent in its communication with stakeholders

Total points scored for this section: 3
Total possible points for this section: 3



PART H - Miscellaneous

Points(MAX) Score

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

SLR Notes:

H.1. AOGC had its first year as a State Partner in 2008 and found some jurisdictional pipe. It conducted its first inspections and issued its first notices relative to 49 CFR 192. In 2009 the pipeline program was expanded to include the part time services of Mrs. Kelly Hert, a Pipeline/Petroleum Engineer with AOGC.

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

SLR Notes:

H.2. AOGC has modified its rules to reference the current version of 49 CFR 190, 191, 192, & 199. In 2009 they were amended again to automatically include all future revisions of the applicable Federal regulations.

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

SLR Notes:

H.3. No, the program has not identified any risk areas to address.

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

SLR Notes:

H.4. Yes, AOGC has responded to all known requests.

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

SLR Notes:

H.5. AOGC has found a way to modify its rules to reference the current version of 49 CFR 190-199, and not have to submit a legislative bill thereafter.

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

SLR Notes:

H.6. AOGC makes its records available to the public and has found a way to modify its rules to reference the current version of 49 CFR 190-192 & 199, and not have to submit a legislative bill thereafter. AOGC was successful in assigning additional staff to the pipeline safety program in 2009

Total points scored for this section: 2.5

Total possible points for this section: 3

PART I - Program Initiatives

Points(MAX) Score

Drug and Alcohol Testing (49 CFR Part 199)

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

SLR Notes:

I.1. Yes, this program was started in 2009 with 2 of 7 operators contacted and the rest are scheduled for 2010.

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

SLR Notes:

I.2. Yes, this program was started in 2009 with 2 of 7 operators contacted and the rest are scheduled for 2010.

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

SLR Notes:

I.3. No, had not understood that it was part of type B gathering. Will likely address in 2010. AOGC added this question to their Standard Inspection addendum sheet effective 7/13/10.

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

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

SLR Notes:

I.4. NA, not part of type B gathering. Will include when Type A and Transmission lines are confirmed.

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

SLR Notes:

I.5. NA, not part of type B gathering. Will include when Type A and Transmission lines are confirmed.

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

SLR Notes:

I.6. NA, not part of type B gathering. Will include when Type A and Transmission lines are confirmed.

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

SLR Notes:

I.7. NA, not part of type B gathering. Will include when Type A and Transmission lines are confirmed

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

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

SLR Notes:

I.8. NA, not part of type B gathering. Will include when Transmission lines are confirmed

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

SLR Notes:

I.9. NA, not part of type B gathering. Will include when Transmission lines are confirmed.

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

I.10. NA, not part of type B gathering. Will include when Transmission lines are confirmed.

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

I.11. NA, not part of type B gathering. Will include when Transmission lines are confirmed.

12	Is the state verifying that operators are periodically examining their transmission line routes for the appearance of new HCAs? Yes = .5 No = 0	.5	NA
-----------	--	----	----

SLR Notes:

I.12. NA, not part of type B gathering. Will include when Transmission lines are confirmed.

Public Awareness (49 CFR Section 192.616)

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, 6/13/08 for master meters) Yes = .5 No = 0	.5	0.5
-----------	--	----	-----

SLR Notes:

I.13. Yes, for 2009 all seven operators have Public Awareness Plans that are developed per API 1162. Most operators have been required to make some amendments. All seven Public Awareness Plans were reviewed in 2008 or 2009.

14	Has the state reviewed the content of these programs for compliance with 192.616 (by participating in the Clearinghouse or by other means)? Yes = .5 No = 0	.5	0.5
-----------	--	----	-----

SLR Notes:

I.14. Yes. The plans have been reviewed relative to API 1162.

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

SLR Notes:

I.15. Yes, during Standard inspections

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

I.16. In 2008 and 2009 most of the operators were developing their Damage Prevention Programs for the first time. They were inspected per API 1162 and were directed to come into compliance with API 1162. They are well aware of the requirement for continuous review and revision. In 2011 they will be re-inspected and their documents of review and revision will be checked.

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

I.17. AOGC developed its program to address Type B Gathering only. It will address expansion of its program when jurisdictional Transmission lines are confirmed. AOGC has procedures and performance to inspect for Drug and Alcohol and for Damage Prevention. OQ and IMP will be addressed when facilities are identified that require them.

Total points scored for this section: 3
Total possible points for this section: 3.5