

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

2016 Gas State Program Evaluation

for

Public Service Commission, State of Wyoming

Document Legend

PART:

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



2016 Gas State Program Evaluation -- CY 2016

Gas

State Agency: Wyoming

Agency Status:

Date of Visit: 09/12/2017 - 09/14/2017

Agency Representative: David Piroutek, Engineering Supervisor, Wyoming Public Service Commission (WYPSC)

PHMSA Representative: Don Martin

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

Name/Title: Alan B. Minier, Chairman

Agency: Wyoming Public Service Commission

Address: 2515 Warren Avenue, Suite 300

City/State/Zip: Cheyenne, Wyoming 82002

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 2016 (not the status of performance at the time of the evaluation). All items for which criteria have not been established should be answered based on the PHMSA representative's judgment. A deficiency in any one part of a multiple part question should be scored as needs improvement. Determine the answer to the question then select the appropriate point value. If a state receives less than the maximum points, include a brief explanation in the space provided for general comments/regional observations. If a question is not applicable to a state, select NA. Please ensure all responses are COMPLETE and ACCURATE, and OBJECTIVELY reflect state program performance. Increasing emphasis is being placed on performance. This evaluation together with selected factors reported in the state's annual progress report attachments provide the basis for determining the state's pipeline safety grant allocation.

Field Inspection (PART G):

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

Scoring Summary

PARTS

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

Possible Points Points Scored

10	10
13	13
44	44
15	14
11	11
8	8
12	12
0	0
0	0

TOTALS

113 112

State Rating

99.1

PART A - Progress Report and Program Documentation Review

Points(MAX) Score

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

Evaluator Notes:

GPLS Trip Record Database contains all of the information for operators and units including which operators and units received an inspection during the year. Operator information is captured from Annual Reports and entered into a spreadsheet to verify operator information. Intrastate LNG operator was transposed as Interstate when entering information into "Wizard". Request for correction was made.

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

Evaluator Notes:

Inspection person days are accounted for on half hour increments. The GPLS Trip Record Database contains inspection person days assigned to inspections. No discrepancies were found between the GPLS information and Attachment 2 information.

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

Evaluator Notes:

The tally of units on Attachment 1 (47 Units) matched the unit totals on Attachment 3. Operator information entered on Attachment 3 were verified with office records.

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

Evaluator Notes:

Attachment 4 of the WYPSC's 2016 Progress Report listed one reportable incident. A review of incident data in the Pipeline Data Mart showed the same reportable incident as the one listed on Attachment 4.

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

Evaluator Notes:

GPLS database inspection follow up spreadsheet accounts for probable violations by operator and inspection. The information compiled from the spreadsheets. No issues with accuracy were found for 2016.

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

Evaluator Notes:

No issues. Most files are electronic instead of hard copy.

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

Evaluator Notes:

All information on Attachment 7 was accurate and supported by documentation.

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

Evaluator Notes:

No issues with Attachment 8.

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

Evaluator Notes:

No issues for improvement on Attachment 10.

- | | | | |
|-----------|--|-----------|-----------|
| 10 | General Comments:
Info Only = No Points | Info Only | Info Only |
|-----------|--|-----------|-----------|

Evaluator Notes:

The WYPSC generally complied with the Part A requirements of this evaluation.

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



PART B - Program Inspection Procedures

Points(MAX) Score

- | | | | |
|---|--|---|---|
| 1 | Standard Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 2 | 2 |
|---|--|---|---|

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

"INSPECTION PROCEDURES FOR THE FACILITIES ENGINEERING STAFF OF THE PUBLIC SERVICE COMMISSION OF WYOMING" contains guidance on what the Standard Inspection should entail on Pages 10 and 11. Pre-inspection activities, inspection activities, post-inspection activities are described in the document on pages 5 -7. The procedures meet expectations.

- | | | | |
|---|--|---|---|
| 2 | IMP and DIMP Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 1 | 1 |
|---|--|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

"INSPECTION PROCEDURES FOR THE FACILITIES ENGINEERING STAFF OF THE PUBLIC SERVICE COMMISSION OF WYOMING" provides guidance on what the IMP and DIMP should entail on page 11. Pre-inspection activities, inspection activities, post-inspection activities are described in the document on pages 5 -7. The procedures meet expectations.

- | | | | |
|---|--|---|---|
| 3 | OQ Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 1 | 1 |
|---|--|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

"INSPECTION PROCEDURES FOR THE FACILITIES ENGINEERING STAFF OF THE PUBLIC SERVICE COMMISSION OF WYOMING" provides guidance on what the OQ inspection should entail on page 11. Pre-inspection activities, inspection activities, post-inspection activities are described in the document on pages 5 -7. The procedures meet expectations.

- | | | | |
|---|---|---|---|
| 4 | Damage Prevention Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 1 | 1 |
|---|---|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

"INSPECTION PROCEDURES FOR THE FACILITIES ENGINEERING STAFF OF THE PUBLIC SERVICE COMMISSION OF WYOMING" revised as of 9/9/2016 was reviewed. Guidance is given on what the Damage Prevention Inspections should entail on page 12. Pre-inspection activities, inspection activities, post-inspection activities are described in the document on pages 5 -7. The procedures meet expectations.

- | | | | |
|---|--|---|---|
| 5 | Any operator training conducted should be outlined and appropriately documented as needed. | 1 | 1 |
|---|--|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

"INSPECTION PROCEDURES FOR THE FACILITIES ENGINEERING STAFF OF THE PUBLIC SERVICE COMMISSION OF WYOMING" provides guidance on when operator training will be provided on page 12. Operator training is not an inspection. Pre-inspection activities, inspection activities, post-inspection is not applicable. The procedures meet expectations.

- 6 Construction Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. 1 1
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

"INSPECTION PROCEDURES FOR THE FACILITIES ENGINEERING STAFF OF THE PUBLIC SERVICE COMMISSION OF WYOMING" provide guidance on when the Construction Inspections will be conducted on page 12. Pre-inspection activities, inspection activities, post-inspection activities are described in the document on pages 5 -7. The procedures meet expectations.

- 7 Does inspection plan address inspection priorities of each operator, and if necessary each unit, based on the following elements? 6 6
Yes = 6 No = 0 Needs Improvement = 1-5
- | | | | |
|--|--------------------------------------|--------------------------|---|
| a. Length of time since last inspection (Within five year interval) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c. Type of activity being undertaken by operators (i.e. construction) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d. Locations of operators inspection units being inspected - (HCA's, Geographic areas, Population Density, etc) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| e. Process to identify high-risk inspection units that includes all threats - (Excavation Damage, Corrosion, Natural Forces, Outside Forces, Material and Welds, Equipment, Operators and any Other Factors) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| f. Are inspection units broken down appropriately? | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

"INSPECTION PROCEDURES FOR THE FACILITIES ENGINEERING STAFF OF THE PUBLIC SERVICE COMMISSION OF WYOMING" provides guidance on what considerations will be involved to schedule inspections on Page 3. The procedures cover the Elements (a through (e above. Inspection units appear to be appropriate.

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

Evaluator Notes:

The WYPSC has generally complied with the Part B requirements of this evaluation.

Total points scored for this section: 13
Total possible points for this section: 13



PART C - Program Performance

Points(MAX) Score

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

A. Total Inspection Person Days (Attachment 2):
195.25

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):
 $220 \times 1.52 = 333.67$

Ratio: A / B
 $195.25 / 333.67 = 0.59$

If Ratio ≥ 0.38 Then Points = 5, If Ratio < 0.38 Then Points = 0
Points = 5

Evaluator Notes:

The WYPSC's ratio of Inspection Person Days to Inspection Person Years was 0.59 which exceeded the minimum required ratio of 0.38.

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

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

Evaluator Notes:

The recently hired inspector, Jacob Kilmurray, recently completed the remaining course, well within the timeframe. All other inspection personnel has completed required training. Wyoming underground corrosion committee training annually. Program Manager attends NARUC Pipeline Safety Sub-Committee to learn of other issues and incidents.

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

Evaluator Notes:

David Pitourek has been the program manager for 13 years. He has completed all of the required courses at PHMSA's Training and Qualifications Division. David is very knowledgeable of the regulations and PHMSA's Guidelines.

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

Evaluator Notes:

The WYPSC responded in 54 days. The Chairman's response addressed PHMSA's concern regarding the Commission's use of civil penalties in enforcement of the program's regulations. Two enforcement cases were cited in PHMSA's letter to the Chairman. The response indicated that one case was resolved without civil penalties and the other was still in progress for consideration of penalties.

- 5 Did State conduct or participate in pipeline safety training session or seminar in Past 3 Years? Chapter 8.5 1 1
Yes = 1 No = 0

Evaluator Notes:

Last was 2016 and previous was 2013 with ND and SD. The three year deadline for the next seminar would be in 2019.

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

Evaluator Notes:

No instances were identified in the WYPSC's inspection records that indicated it did not meet the inspection intervals set out in its procedures.

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

Evaluator Notes:

The WYPSC utilizes PHMSA IA inspection forms for all inspection types (except Construction). Upon a review of randomly selected inspection reports there were no instances identified where the WYPSC did not complete all applicable questions on the inspection forms.

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|----------|---|---|----|
| 8 | Did the state review operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken? (NTSB) Chapter 5.1
Yes = 1 No = 0 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

Upon a review of PHMSA's Pipeline Datamart there is no Cast Iron pipeline in the state of Wyoming.

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|----------|--|---|----|
| 9 | Did the state review operator procedures for surveillance of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leakage history, or other unusual operating maintenance condition? (Note: See GPTC Appendix G-18 for guidance) (NTSB) Chapter 5.1
Yes = 1 No = 0 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

Upon a review of PHMSA's Pipeline Datamart there is no Cast Iron pipeline in the state of Wyoming.

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|-----------|---|---|---|
| 10 | Did the state review operator emergency response procedures for leaks caused by excavation damage near buildings and determine whether the procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings Refer to 4/12/01 letter from PHMSA in response to NTSB recommendation P-00-20 and P-00-21? (NTSB) Chapter 5.1
Yes = 1 No = 0 | 1 | 1 |
|-----------|---|---|---|

Evaluator Notes:

The WYPSSC utilizes PHMSA's IA Standard Inspection form. This form covers this requirement. Upon a review of randomly selected inspection forms this requirement was reviewed.

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|-----------|--|---|---|
| 11 | Did the state review operator records of previous accidents and failures including reported third party damage and leak response to ensure appropriate operator response as required by 192.617? Chapter 5.1
Yes = 1 No = 0 | 1 | 1 |
|-----------|--|---|---|

Evaluator Notes:

The WYPSSC utilizes PHMSA's IA Standard Inspection form. This form covers this requirement. Upon a review of randomly selected inspection forms this requirement was reviewed.

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| 12 | Has the state reviewed Operator Annual reports, along with Incident/Accident reports, for accuracy and analyzed data for trends and operator issues?
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|--|---|---|

Evaluator Notes:

The WYPSC enters the data from Annual Reports into a spreadsheet. The spreadsheet is reviewed for possible inaccuracies. Damages per 1000 locate tickets is analyzed and trended over multiple years. Miles, leaks (and types of leaks), age of infrastructure, percent of unknown vintage, cathodically unprotected mains and service lines and lost and unaccounted for gas. The WYPSC has begun trending data for gas distribution operators individually.

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

One OQ program was inspected in 2016. The inspection was not completed until 2017. No IMP or DIMP were conducted during 2016.

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

The WYPSSC utilizes PHMSA's IA Standard Transmission Inspection form. This form cover this requirement. Upon a review of randomly selected inspection forms the results of this requirement's review was completed on the form.

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

The WYPSC did conduct a full Drug and Alcohol Program review for one operator in 2016. There were two positive tests that were reviewed for operator's follow-up.

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

The WYPSC is within the five year interval for OQ Program Inspections. One OQ Program was inspected in 2016 (completed in 2017). 4.5 Inspection Person Days were spent on OQ Protocol 9 inspections.

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

The WYPSC did not conduct any IMP inspections during 2016. The WYPSC is within the five year interval but will have to provide a higher priority in 2017 to maintain the interval.

- | | | | |
|-----------|---|---|---|
| 18 | Is state verifying operator's gas distribution integrity management Programs (DIMP)? This should include a review of DIMP plans, along with monitoring progress. In addition, the review should take in to account program review and updates of operators plan(s). (Are the State's largest operators programs being contacted or reviewed annually?). 49 CFR 192 Subpart P DIMP ? First round of program inspections should have been complete by December 2014
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|---|---|---|
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Evaluator Notes:

The WYPSC did not conduct any DIMP inspections during 2017. The WYPSC is within the five year interval but will have to provide a higher priority in 2017 to maintain the interval.

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|----|--|---|---|
| 19 | Is state verifying operators Public Awareness programs are up to date and being followed. State should also verify operators have evaluated Public Awareness programs for effectiveness as described in RP1162. PAPEI Effectiveness Inspections should have been completed by December 2013. PAPEI Effectiveness Inspections should be conducted every four years by operators. 49 CFR 192.616
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----|--|---|---|

Evaluator Notes:

The WYPSC did not conduct any Public Awareness inspections during 2016. The WYPSC is within the five year interval but will have to provide a higher priority in 2017 to maintain the interval.

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

Evaluator Notes:

Yes, the WYPSC forwards advisory bulletins to all operators. The WY PSC website has a section on Pipeline Safety. Information is updated in this section.

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

Evaluator Notes:

There were no SRC Reports filed by operators in the state of Wyoming. This was confirmed in the Pipeline DataMart.

- | | | | |
|----|---|---|---|
| 22 | Did the State ask Operators to identify any plastic pipe and components that has shown a record of defects/leaks and what those operators are doing to mitigate the safety concerns?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----|---|---|---|

Evaluator Notes:

The WYPSC utilizes the PHMSA IA Standard Inspection Form. This requirement is covered on the form.

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

Evaluator Notes:

None were found where the WYSC did not respond.

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|----|--|---|---|
| 24 | If the State has issued any waivers/special permits for any operator, has the state verified conditions of those waivers/special permits are being met? This should include having the operator amend procedures where appropriate.
No = 0 Needs Improvement = .5 Yes = 1 | 1 | 1 |
|----|--|---|---|

Evaluator Notes:

The WYPSC is aware of the special permits (waivers) and has followed up to make sure they are being met. The WYPSC should communicate to PHMSA Regulations those waivers listed on PHMSA's web site that are not valid so they can be removed.

- | | | | |
|----|---|---|---|
| 25 | Did the state attend the National NAPSRS Board of Directors Meeting in CY being evaluated?
No = 0 Needs Improvement = .5 Yes = 1 | 1 | 1 |
|----|---|---|---|

Evaluator Notes:

Mr. Piroutek attended the National Meeting during 2016 in Indianapolis..

- | | | | |
|----|---|---|---|
| 26 | Discussion on State Program Performance Metrics found on Stakeholder Communication site - http://primis.phmsa.dot.gov/comm/states.htm
No = 0 Needs Improvement = 1 Yes = 2 | 2 | 2 |
|----|---|---|---|

- a. Discussion of Potential Accelerated Actions (AA's) based on any negative trends Yes ☒ No ☐ Needs Improvement ☐
- b. NTSB P-11-20 Meaningful Metrics Yes ☒ No ☐ Needs Improvement ☐

Evaluator Notes:

Most metrics were found to be trending in a direction of improvement:
 Damages per 1000 locate tickets
 Inspection days per 1000 miles of pipeline
 Inspection days per MMO/LPG Unit (Drop off in 2015)
 Gas Distribution Leaks Metrics

A couple of metrics were maintaining a flat trend.

Gas Inspectors Qualifications Training
 Enforcement Metrics

- 27 Discussion with State on accuracy of inspection day information submitted into State Info Only Info Only
 Inspection Day Calculation Tool. (No points)
 Info Only = No Points

Evaluator Notes:

The number of Inspection Person-Days increased upon using the SICT. The revised number is 242 Inspection Person-Days. The Program Manager believes that the two present inspectors and some of his time dedicated to inspections the 242 days are achievable without adding additional staff.

- 28 Did the State verify Operators took appropriate action regarding Pipeline Flow Reversals, Info Only Info Only
 Product Changes and Conversions to Service? See ADP-2014-04 (No Points)
 Info Only = No Points

Evaluator Notes:

Yes, none were found to have performed these actions.

- 29 General Comments: Info Only Info Only
 Info Only = No Points

Evaluator Notes:

The WYPSC has generally complied with Part C requirements of this evaluation.

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



PART D - Compliance Activities

Points(MAX) Score

- | | | | |
|----------|--|---|---|
| 1 | Does the state have written procedures to identify steps to be taken from the discovery to resolution of a probable violation? Chapter 5.1
Yes = 4 No = 0 Needs Improvement = 1-3 | 4 | 4 |
| a. | Procedures to notify an operator (company officer) when a noncompliance is identified | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. | Procedures to routinely review progress of compliance actions to prevent delays or breakdowns | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c. | Procedures regarding closing outstanding probable violations | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

The WYPSC has in its procedures the requirement that notifications be sent to a company officer when it involves a private company. The WYPSC requires operators to provide written responses within 30 days. Compliance actions are monitored to ensure operators respond and take corrective action. A written notification of closure is provided to the operator upon closure of the inspection file.

- | | | | |
|----------|--|---|---|
| 2 | Did the state follow compliance procedures (from discovery to resolution) and adequately document all probable violations, including what resolution or further course of action is needed to gain compliance? Chapter 5.1
Yes = 4 No = 0 Needs Improvement = 1-3 | 4 | 4 |
| a. | Were compliance actions sent to company officer or manager/board member if municipal/government system? | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. | Document probable violations | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c. | Resolve probable violations | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d. | Routinely review progress of probable violations | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| e. | Were applicable civil penalties outlined in correspondence with operator(s) | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

Upon a review of randomly selected inspection reports completed in 2016 there were no instances identified where the WYPSC did not adequately document probable violations. The WYPSC requires operators to respond to non-compliance notifications. There were no reports found where the operator did not respond within thirty days. If corrective actions are not completed within 30 days evidence was available that showed the WYPSC continued to follow-up until corrective action was completed. The WYPSC, in the last paragraph of each non-compliance notice, provides a statement providing the civil penalties that could be levied regarding non-compliance.

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

Evaluator Notes:

Upon a review of randomly selected inspection reports completed in 2016 there were no instances identified where the WYPSC did not give reasonable due process. According to Commission rules operators are allowed to request show cause proceedings to argue their case.

- | | | | |
|----------|---|---|---|
| 4 | Did compliance actions give reasonable due process to all parties? Including "show cause" hearing if necessary.
Yes = 2 No = 0 | 2 | 2 |
|----------|---|---|---|

Evaluator Notes:

Upon a review of randomly selected inspection reports completed in 2016 there were no instances identified where the WYPSC did not give reasonable due process. According to Commission rules operators are allowed to request show cause proceedings to argue their case.

- | | | | |
|----------|---|---|---|
| 5 | Is the program manager familiar with state process for imposing civil penalties? Were civil penalties considered for repeat violations (with severity consideration) or violations resulting in incidents/accidents? (describe any actions taken)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

Evaluator Notes:

Yes, the program manager is aware of the process and the criteria that would justify seeking a civil penalty from the Commission.

- 6** Can the State demonstrate it is using their enforcement fining authority for pipeline safety violations? 1 0
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Needs improvement. As identified in previous evaluations the WYPSC has not demonstrated the use of civil penalties. It was noted in the Chairman's letter for CY2014 and CY2015 evaluations.

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

Evaluator Notes:

Question D.7 - Needs improvement. As identified in previous evaluations the WYPSC has not demonstrated the use of civil penalties. It was noted in the Chairman's letter for CY2014 and CY2015 evaluations.

Total points scored for this section: 14
Total possible points for this section: 15



PART E - Incident Investigations

Points(MAX) Score

- 1 Does the state have written procedures to address state actions in the event of an incident/accident? 2 2

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

As noted in previous evaluations, the WY PSC provides for these procedures in Commission Rule, Chapter 3 - Section 27 (d).

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

Yes = 2 No = 0 Needs Improvement = 1

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

Evaluator Notes:

See Question E.1 comments for mechanism to receive operator reports. Yes, the acknowledgement is confirmed in the WYPSC procedures, Section 3(g).

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

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

One reportable incident occurred during 2016 which was caused by third party damage. The WYPSC determined that it could complete the investigation (as allowed by its procedures) by a "desk review" of damage prevention and One Call System documents. A site visit was not made.

- 4 Were all incidents investigated, thoroughly documented, and with conclusions and recommendations? 3 3

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

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

Evaluator Notes:

The investigation report covered all of the requirements for completing an incident investigation.

- 5 Did the state initiate compliance action for violations found during any incident/accident investigation? 1 1

Yes = 1 No = 0

Evaluator Notes:

There were no probable violations found for the pipeline operator. It appeared that the excavator did not comply with Wyoming's damage prevention law but will have to be enforced by the state's Attorney General.

- 6 Did the state assist region office by taking appropriate follow-up actions related to the operator incident reports to ensure accuracy and final report has been received by PHMSA? (validate report data from operators concerning incidents/accidents and investigate discrepancies) Chapter 6 1 1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

No instances were found where the WYPSC did not take appropriate follow up actions.

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

Yes = 1 No = 0

Evaluator Notes:

Yes, the WYPSC presented the details of the one incident that occurred in 2016 during NAPSRS's Western Region meeting.

8 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

The WYPSC generally complied with the requirements of Part E of this evaluation.

Total points scored for this section: 11
Total possible points for this section: 11



PART F - Damage Prevention

Points(MAX) Score

- | | | | |
|---|--|---|---|
| 1 | Has the state reviewed directional drilling/boring procedures of each pipeline operator or its contractor to determine if they include actions to protect their facilities from the dangers posed by drilling and other trench less technologies? NTSB
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

The WYPSC covers this requirement when O&M procedures are inspected under 192.614 (c). Upon a review of randomly selected inspection reports completed in 2016 all inspection forms included a review of 192.614(c) requirements.

- | | | | |
|---|---|---|---|
| 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?
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|---|---|---|

Evaluator Notes:

The WYPSC reviews operator records documenting their 811 calls for their excavation activities. This is covered in a Standard Inspection when reviewing requirements for 192.614.

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

Evaluator Notes:

The WY PSC participates in the PHMSA One Call Grant program. The grant purchases advertising around the state to promote the use of the One Call system. The WYPSC attends the annual state One Call meeting. The WYPSC, in conjunction with the One Call System and the gas association, on occasion meets with excavators in local town meetings across the state.

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

Evaluator Notes:

The WYPSC collects and trends information obtained from operators' Annual Reports. The data is now viewed on an operator basis also. See comments on Question C.12.

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

Evaluator Notes:

The WYPSC generally complied with Part F requirements of this evaluation.

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

PART G - Field Inspections

Points(MAX) Score

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

Name of Operator Inspected:

Devon Energy

Name of State Inspector(s) Observed:

Perry McCollom

Location of Inspection:

Riverton, WY

Date of Inspection:

September 12, 2017

Name of PHMSA Representative:

Don Martin

Evaluator Notes:

The WYPSC conducted a Standard Inspection of Devon Energy's Transmission Pipeline near Riverton, WY. The operator was represented by Nick Jenson, EHS Professional and Josh Martin, Operator. Operating Procedures was covered during the inspection. Operations and Maintenance Records documenting compliance with portions of Part 192 were reviewed. Facilities in the field were inspected.

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

Evaluator Notes:

Yes, the WYPSC provided notification of the inspection by email in April, 2017. Two operator representatives were present.

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

Evaluator Notes:

Yes, the WYPSC inspector utilized PHMSA's Inspection Assistant application to create the inspection form and document the results.

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

Evaluator Notes:

Yes, the inspector documented the results in PHMSA's Inspection Assistant inspection application.

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

Evaluator Notes:

Yes, the inspector covered this concern thoroughly.

- | | | | |
|---|--|---|---|
| 6 | Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list) | 2 | 2 |
| | Yes = 2 No = 0 Needs Improvement = 1 | | |

a. Procedures

☒

b. Records

☒

c. Field Activities

☒

d. Other (please comment)

☐

Evaluator Notes:

Procedures were not reviewed for adequacy during this inspection since it is covered during a separate inspection.

Procedures were referred to while confirming that records adhered to the procedures. Records were reviewed in their entirety. The pipeline facilities in the field were inspected and test readings for cathodic protection were taken.

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

Evaluator Notes:

No issue were identified with the inspector's knowledge. The inspector has completed all required training for this type of inspection at PHMSA's Training and Qualifications facility.

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

Evaluator Notes:

Yes, an exit interview was conducted with the operator' representatives at the conclusion of the inspection visit.

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

Evaluator Notes:

No probable violations were noted during the exit interview but it was noted that additional information was needed from the operator on certain items before a determination could be made. The operator agreed to follow up with information.

- | | | | |
|----|---|-----------|-----------|
| 10 | General Comments: 1) What did the inspector observe in the field? (Narrative description of field observations and how inspector performed) 2) Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices) 3) Other.
Info Only = No Points | Info Only | Info Only |
|----|---|-----------|-----------|

- | | | |
|----|-----------------------------------|-------------------------------------|
| a. | Abandonment | <input type="checkbox"/> |
| b. | Abnormal Operations | <input checked="" type="checkbox"/> |
| c. | Break-Out Tanks | <input type="checkbox"/> |
| d. | Compressor or Pump Stations | <input type="checkbox"/> |
| e. | Change in Class Location | <input checked="" type="checkbox"/> |
| f. | Casings | <input type="checkbox"/> |
| g. | Cathodic Protection | <input checked="" type="checkbox"/> |
| h. | Cast-iron Replacement | <input type="checkbox"/> |
| i. | Damage Prevention | <input checked="" type="checkbox"/> |
| j. | Deactivation | <input type="checkbox"/> |
| k. | Emergency Procedures | <input checked="" type="checkbox"/> |
| l. | Inspection of Right-of-Way | <input checked="" type="checkbox"/> |
| m. | Line Markers | <input checked="" type="checkbox"/> |
| n. | Liaison with Public Officials | <input checked="" type="checkbox"/> |
| o. | Leak Surveys | <input checked="" type="checkbox"/> |
| p. | MOP | <input type="checkbox"/> |
| q. | MAOP | <input checked="" type="checkbox"/> |
| r. | Moving Pipe | <input type="checkbox"/> |
| s. | New Construction | <input 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 checked="" type="checkbox"/> |
| y. | Purging | <input type="checkbox"/> |
| z. | Prevention of Accidental Ignition | <input type="checkbox"/> |

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

Evaluator Notes:

The WYPSC generally complied with the requirements of Part G of this evaluation.

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



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

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

Evaluator Notes:

The WYPSC is not an interstate agent.

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

Evaluator Notes:

The WYPSC is 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?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

The WYPSC is not an interstate agent.

- | | | | |
|----------|---|---|----|
| 4 | Were probable violations identified by state referred to PHMSA for compliance? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

The WYPSC is 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?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

The WYPSC is not an interstate agent.

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

Evaluator Notes:

The WYPSC is not an interstate agent.

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

Evaluator Notes:

The WYPSC is not an interstate agent.

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

Evaluator Notes:

The WYPSC is not an interstate agent.

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

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

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

Evaluator Notes:

The WYSPC does not have a 60106 agreement with PHMSA.

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

Evaluator Notes:

The WYSPC does not have a 60106 agreement with PHMSA.

- | | | | |
|----------|---|---|----|
| 3 | Were any probable violations identified by state referred to PHMSA for compliance? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

The WYSPC does not have a 60106 agreement with PHMSA.

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

Evaluator Notes:

The WYSPC does not have a 60106 agreement with PHMSA.

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

Evaluator Notes:

The WYSPC does not have a 60106 agreement with PHMSA.

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

Evaluator Notes:

The WYSPC does not have a 60106 agreement with PHMSA.

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

Evaluator Notes:

The WYSPC does not have a 60106 agreement with PHMSA.

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