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

1200 New Jersey Avenue SE
Washington DC 20590

2010 Natural Gas State Program Evaluation

for

Utah Division of Public Utilities

Document Legend
PART:

- O -- Representative Date and Title Information
- A -- General Program Qualifications
- B -- Inspections and Compliance - Procedures/Records/Performance
- C -- Interstate Agent States
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2010 Natural Gas State Program Evaluation -- CY 2010

Natural Gas

State Agency: Utah
Agency Status:
Rating:
60105(a): Yes **60106(a):** No **Interstate Agent:** No
Date of Visit: 06/28/2011 - 06/30/2011
Agency Representative: Al Zadeh, Program Manager
PHMSA Representative: Rex Evans
Commission Chairman to whom follow up letter is to be sent:

Name/Title: Chris Parker, Director, DIvision of Public Utilities
Agency: Utah Department of Commerce
Address: 160 East 300 South
City/State/Zip: Salt Lake City, UT 81114

INSTRUCTIONS:

Complete this evaluation in accordance with the Procedures for Evaluating State Pipeline Safety Program. The evaluation should generally reflect state program performance during CY 2010 (not the status of performance at the time of the evaluation). All items for which criteria have not been established should be answered based on the PHMSA representative's judgment. A deficiency in any one part of a multiple part question should be scored as needs improvement. Determine the answer to the question then select the appropriate point value. If a state receives less then 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	26	25
B	Inspections and Compliance - Procedures/Records/Performance	24	22
C	Interstate Agent States	0	0
D	Incident Investigations	7	7
E	Damage Prevention Initiatives	9	8
F	Field Inspection	11	10
G	PHMSA Initiatives - Strategic Plan	10	9
H	Miscellaneous	3	3
I	Program Initiatives	9	9
TOTALS		**99**	**93**
State Rating			**93.9**

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	7

a.	State Jurisdiction and agent status over gas facilities (1)	☒
b.	Total state inspection activity (2)	☒
c.	Gas facilities subject to state safety jurisdiction (3)	☒
d.	Gas pipeline incidents (4)	☒
e.	State compliance actions (5)	☐
f.	State record maintenance and reporting (6)	☒
g.	State employees directly involved in the gas pipeline safety program (7)	☒
h.	State compliance with Federal requirements (8)	☒

SLR Notes:

State Compliance actions were not correctly listed, master meters omitted and numbers were not correct. Discussed state inspection activity should be a maximum of one person-day per day regardless of working hours.

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:

On call list is shared with operators. No issues

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	2

SLR Notes:

TQ Seminar was last held August 26-27, 2010. Approximately 95 attendees

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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:

Files were reviewed - care should be taken to place all follow-up letters in files along with final copies only. Drafts letters should be removed.

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:

No issues. Al has been in program for many years.

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	1

SLR Notes:

Yes, response letter dated August 24, 2010

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 Yes = 1 No = 0	1	1

SLR Notes:

State initiated action in compliance tracking, although further improvement is still needed. See compliance action section.

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 sucessfully 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

Yes = 3 No = 0

3 3

SLR Notes:

Training files were reviewed for staff. No issues

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9 Brief Description of Non-TQ training Activities:

Info Only = No Points

Info Only Info Only

For State Personnel:

For Operators:

Master Meter guidance was developed to assist their operation efforts.

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

SLR Notes:

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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

Yes = 1 No = 0

1 1

SLR Notes:

No issues, TQ training transcripts reviewed

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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

Yes = 1 No = 0

1 1

SLR Notes:

No issues, TQ training transcripts reviewed

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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

Yes = 5 No = 0

5 5

A. Total Inspection Person Days (Attachment 2):

259.00

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

220 X 2.37 = 520.67

Ratio: A / B

259.00 / 520.67 = 0.50

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

Points = 5

SLR Notes:

No issues

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

Info Only = No Points

Info Only Info Only

SLR Notes:

No changes

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

SLR Notes:

Total points scored for this section: 25
Total possible points for this section: 26

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

Points(MAX) **Score**

Inspection Procedures

1 Does the State have a written inspection plan to complete the following? (all types of operators including LNG) (Chapter 5.1) Previous Question B.1 + Chapter 5 Changes + Incorporate LNG — 6.5 — 6.5

Yes = 6.5 No = 0 Needs Improvement = 50% Deduction

a	Standard Inspections (Including LNG) (Max points = 2)	Yes ◉	No ○	Needs Improvement ○
b	IMP Inspections (Including DIMP) (Max points = .5)	Yes ◉	No ○	Needs Improvement ○
c	OQ Inspections (Max points = .5)	Yes ◉	No ○	Needs Improvement ○
d	Damage Prevention (Max points = .5)	Yes ◉	No ○	Needs Improvement ○
e	On-Site Operator Training (Max points = .5)	Yes ◉	No ○	Needs Improvement ○
f	Construction Inspections (Max points = .5)	Yes ◉	No ○	Needs Improvement ○
g	Incident/Accident Investigations (Max points = 1)	Yes ◉	No ○	Needs Improvement ○
h	Compliance Follow-up (Max points = 1)	Yes ◉	No ○	Needs Improvement ○

SLR Notes:

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2 Did the written Procedures for selecting operators adequately address key concerns? (Chapter 5.1) Previous Question B.2, items a-d are worth .5 point each — 2 — 2

Yes = 2 No = 0 Needs Improvement = 50% Deduction

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

SLR Notes:

No issues. Questar comprises 99% of everything in state

Inspection Performance

3 Did the state inspect all types of operators and inspection units in accordance with time intervals established in its written procedures? (Chapter 5.1) Previous Question B.3 — 2 — 2

Yes = 2 No = 0

SLR Notes:

No issues, all inspected within timeframes prescribed. Again Questar is 99% of everything in state.

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4 Did the state inspection form cover all applicable code requirements addressed on the Federal Inspection forms? (Chapter 5.1 (3)) Previous Question B.4 — 1 — 1

Yes = 1 No = 0

SLR Notes:

State uses Federal checklist

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5 Did state complete all applicable portions of inspection forms? (Chapter 5.1 (3)) Previous Question B.5 — 1 — 1

Yes = 1 No = 0

SLR Notes:

Inspections reviewed appear to be complete

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6 Did the state initiate appropriate follow-up actions to Safety Related Condition Reports? (Chapter 6.3) Previous Question B.6 — .5 — .5

Yes = .5 No = 0

SLR Notes:

No issues

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 Yes = .5 No = 0	.5	NA

SLR Notes:

No cast iron in state

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 Yes = .5 No = 0	.5	NA

SLR Notes:

No cast iron in state

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 Yes = .5 No = 0	.5	.5

SLR Notes:

These are reviewed with operators, but need to amend and add to checklist

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 Yes = 1 No = 0	1	1

SLR Notes:

No issues.

Compliance - 60105(a) States

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

SLR Notes:

Documentation and tracking needs further improvement. Some compliance actions reviewed lacked clear resolution. Effort was made since last evaluation, but further improvement is needed.

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 Yes = 1 No = 0 Needs Improvement = .5	1	1

SLR Notes:

Procedure is there, just better tracking and review.

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 Yes = 1 No = 0 Needs Improvement = .5	1	1

SLR Notes:

Procedures in place.

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 Yes = 1 No = 0 Needs Improvement = .5	1	1

SLR Notes:

Procedure is there, primarily left up to inspecting engineer for follow up

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 — 1 — 1

Yes = 1 No = 0

SLR Notes:

No issues

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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 — 1 — .5

Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

Repeat issues, although progress made still need to improve follow-up and tracking improvement. Suggestions given to assist.

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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 — 1 — 1

No = 0 Yes = 1

SLR Notes:

Yes, for example. Questar case pending for violation of 192.614.

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18 Did the state adequately document the resolution of probable violations? (Chapter 5.1 (6)) Previous Question D(1).7 — 1 — .5

Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

Needs further improvement and field verification on some issues reviewed. Operators reviewed with multiple violations were closed on records, but further field verification needed. For example, on some OQ violations need on-site verification.

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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 — .5 — 0

Yes = .5 No = 0

SLR Notes:

Some compliance actions reviewed were only sent to operating personnel. NEBO Power Station. Letters should clearly state title of individual the correspondence is being directed.

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20 Did the compliance proceedings give reasonable due process to all parties? (check each states enforcement procedures) Previous Question D(1).9 — 1 — 1

Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

Compliance - 60106(a) States

21 Did the state use the current federal inspection form(s)? Previous Question D(2).1 — 1 — NA

Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

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22 Are results adequately documented demonstrating inspection units were reviewed in accordance with state inspection plan? Previous Question D(2).2 — 1 — NA

Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

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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

Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

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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

Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

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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

Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

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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

Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

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27 Is the program manager familiar with state process for imposing civil penalties? Were civil penalties considered for repeat violations (with severity consideration) or violations resulting in incidents/accidents? (describe any actions taken) — Info Only — Info Only

Info Only = No Points

SLR Notes:

Two assigned attorneys to their division. Had recent issue with damage prevention, etc.

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28 Part B: General Comments/Regional Observations — Info Only — Info Only

Info Only = No Points

SLR Notes:

Total points scored for this section: 22
Total possible points for this section: 24

PART C - Interstate Agent States

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

SLR Notes:

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:

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:

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:

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:

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

SLR Notes:

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:

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

SLR Notes:

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 Yes = 1 No = 0 Needs Improvement = .5	1	1

SLR Notes:

No issues

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 Yes = .5 No = 0	.5	.5

SLR Notes:

No issues

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

SLR Notes:

No issues

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 Yes = 1 No = 0 Needs Improvement = .5	1	1

SLR Notes:

No issues

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

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:

No issues

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

SLR Notes:

Questar docket pending on damage prevention marking as cause of incident.

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 Yes = .5 No = 0	.5	0.5

SLR Notes:

No issues

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

SLR Notes:

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

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:

IT appears to have been reviewed based on notes on inspection checklist, but state needs to add to checklist for verification. 2nd request.

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:

Again, much work is done in this area. Again should put on checklist.

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:

Questar has adopted those practices and Blue Stakes participation.

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	0

SLR Notes:

Still has not collected this information

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	2

SLR Notes:

Same questions 192.617 collected on annual inspection. No issues.

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

SLR Notes:

Total points scored for this section: 8

Total possible points for this section: 9

PART F - Field Inspection

		Points(MAX)	Score
1	Operator, Inspector, Location, Date and PHMSA Representative Info Only = No Points Name of Operator Inspected: Questar Gas Name of State Inspector(s) Observed: David Hassell Location of Inspection: Logan, Utah Date of Inspection: June 29, 2011 Name of PHMSA Representative: Rex Evans	Info Only	Info Only

SLR Notes:

General Day was spending inspecting valves, and taking CP reads on valve sections.

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

SLR Notes:

No issues

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 Yes = 2 No = 0	2	2

SLR Notes:

Since this was doing a field verification inspection, the inspector documented locations and observations for each site visited. No issues.

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

SLR Notes:

No issues

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 Yes = 1 No = 0	1	1

SLR Notes:

No issues

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 = No Points	Info Only	Info Only

SLR Notes:

Mostly valve and CP inspections. CP reads taken on valve heads, etc. And one crossing atmospheric corrosion inspection.

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

SLR Notes:

The inspector appeared unfamiliar with company procedures on valve inspections. Questar procedures indicate that valve inspections were to include painting of valve box covers, along with using CGI to test for gas indications. This was not done, nor did it appear many of the valve covers had ever had yellow paint.

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8 Did the inspector have adequate knowledge of the pipeline safety program and regulations? (Liaison will document reasons if unacceptable) Previous Question F.8 — 2 — 2

Yes = 2 No = 0

SLR Notes:

Appears to have adequate knowledge, just needs to pay closer attention to company procedures and not make "assumptions".

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9 Did the inspector conduct an exit interview? (If inspection is not totally complete the interview should be based on areas covered during time of field evaluation) Previous Question F.10 — 1 — 1

Yes = 1 No = 0

SLR Notes:

Brief review completed of days activity. No issues.

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10 During the exit interview, did the inspector identify probable violations found during the inspections? Previous Question F.11 — 1 — NA

Yes = 1 No = 0

SLR Notes:

Since it was unclear what inspector asked the company to perform for him during the audit, no violations were found. Advised program manager issues relating to company procedures during valve inspections.

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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:

Previously noted.

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12 Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices) — Info Only — Info Only

Info Only = No Points

SLR Notes:

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13 Field Observation Areas Observed (check all that apply) — Info Only — Info Only

Info Only = No Points

a.	Abandonment	☐
b.	Abnormal Operations	☐
c.	Break-Out Tanks	☐
d.	Compressor or Pump Stations	☐
e.	Change in Class Location	☐
f.	Casings	☒
g.	Cathodic Protection	☒
h.	Cast-iron Replacement	☐
i.	Damage Prevention	☐
j.	Deactivation	☐
k.	Emergency Procedures	☐
l.	Inspection of Right-of-Way	☐
m.	Line Markers	☒
n.	Liaison with Public Officials	☐
o.	Leak Surveys	☐
p.	MOP	☐
q.	MAOP	☐
r.	Moving Pipe	☐
s.	New Construction	☐

t.	Navigable Waterway Crossings	☐
u.	Odorization	☐
v.	Overpressure Safety Devices	☐
w.	Plastic Pipe Installation	☐
x.	Public Education	☐
y.	Purging	☐
z.	Prevention of Accidental Ignition	☐
A.	Repairs	☐
B.	Signs	☐
C.	Tapping	☐
D.	Valve Maintenance	☒
E.	Vault Maintenance	☐
F.	Welding	☐
G.	OQ - Operator Qualification	☐
H.	Compliance Follow-up	☐
I.	Atmospheric Corrosion	☒
J.	Other	☐

SLR Notes:

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14 Part F: General Comments/Regional Observations — Info Only Info Only

Info Only = No Points

SLR Notes:

Also discovered issue with plastic pipe UV explosure. Discussed three year vs. two years to UV exposure. 192.321 and interpretation says two years, ASTMD2513 says 3 years, but PHMSA has not adopted version since 1999 editions. Questar has three years in procedure manual, relayed to program manager as he should discuss with inspectors and operators.

Total points scored for this section: 10
Total possible points for this section: 11

PART G - PHMSA Initiatives - Strategic Plan

		Points(MAX)	Score

Risk base Inspections - Targeting High Risk Areas

1 Does state have process to identify high risk inspection units? — 1.5 — 1.5

Yes = 1.5 No = 0

Risk Factors (criteria) to consider may include:

Miles of HCA's, Geographic area, Population Density

Length of time since last inspection

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

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

SLR Notes:

No issues. With Questar having 99% of all lines in state they closely monitor their activities.

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

Yes = .5 No = 0

SLR Notes:

No issues

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

Info Only = No Points

SLR Notes:

pending

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4 Does state inspection process target high risk areas? — .5 — 0.5

Yes = .5 No = 0

SLR Notes:

Yes, Questar has $50mm replacement plan on books and they are targeting sections with problems. Aldyl-A plastic and some post WWII tubing used as gas pipe replacement.

Use of Data to Help Drive Program Priority and Inspections

5 Does state use data to analyze effectiveness of damage prevention efforts in the state? (DIRT or other data, etc) — .5 — 0.5

Yes = .5 No = 0

SLR Notes:

Almost all damages on Questar system and they review regularly.

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

Yes = .5 No = 0

SLR Notes:

Operator reports were reviewed during inspections and in files. No issues. Recommend master file with all operator annual reports and historical data. Also recommended pipeline data mart and using it and confirming information

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7 Has state analyzed annual report data for trends and operator issues? — .5 — 0.5

Yes = .5 No = 0

SLR Notes:

With questar as 99% and remaining operators very small, they assume they are keeping close eye on issues. Recommended and they should have files during next inspection to prove they are looking at trends. This can include a file on each operator with annual report information and a sign off that they reviewed, or spreadsheet analysis, or look and see if information on pipeline data mart can establish trend analysis.

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8 Has state reviewed data on Incident/Accident reports for accuracy? — .5 — 0.5

Yes = .5 No = 0

SLR Notes:

No issues, only one reportable last year

9 Does state do evaluation of effectiveness of program based on data? (i.e. performance measures, trends, etc.) .5 0

Yes = .5 No = 0

SLR Notes:

No effectiveness evaluation, recommend looping with other data analysis information.

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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 0

Yes = .5 No = 0

SLR Notes:

None done since initial OQ inspections. They need to get these inputted and possibly go back and do full reevaluation on Questars programs.

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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 0.5

Yes = .5 No = 0

SLR Notes:

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12 Have the IMP Federal Protocol forms been uploaded to the IMDB? Previous Question B.17 .5 0.5

Yes = .5 No = 0

SLR Notes:

Some of the original protocols have been uploaded, Questar and Williams, but state needs to review entire IMP process to ensure they are up to date. They are being included on inspection result information, but unclear as to what needs to be uploaded. They need to spend some time analyzing this to make sure all things are covered with all IMP plans.

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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 0.5

Yes = .5 No = 0

SLR Notes:

need to add to checklist

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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 0.5

Yes = .5 No = 0

SLR Notes:

No issues, need to make sure confirmed on checklist

Accident/Incident Investigation Learning and Sharing Lessons Learned

15 Has state shared lessons learned from incidents/accidents? (i.e. NAPSR meetings and communications) .5 0.5

Yes = .5 No = 0

SLR Notes:

NAPSR meeting presentation. No issues

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16 Does the State support data gathering efforts concerning accidents? (Frequency/Consequence/etc) .5 0.5

Yes = .5 No = 0

SLR Notes:

No issues

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17 Does state have incident/accident criteria for conducting root cause analysis? Info Only Info Only

Info Only = No Points

SLR Notes:

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

Info Only = No Points

SLR Notes:

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19 Has state participated on root cause analysis training? (can also be on wait list) .5 0.5

Yes = .5 No = 0

SLR Notes:

waitlist. Needs to get in during next cycle or lose points

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:

Blue stakes, etc.

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21 Does state share enforcement data with public? (Website, newsletters, docket access, etc.) .5 0.5

Yes = .5 No = 0

SLR Notes:

Dockets posted for public on web

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22 Part G: General Comments/Regional Observations Info Only Info Only

Info Only = No Points

SLR Notes:

Total points scored for this section: 9

Total possible points for this section: 10

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:

Regularly attend Blue Stakes, DP meetings. Participating in newly formed Utah Pipeline Assn, for public awareness issues.

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:

Damage prevention laws clarified, and Civil penalties reinstalled in last session. Going back to 5 day workweek.

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

SLR Notes:

Seasonal training for all locators as part of stipulated settlement in Questar gas case. Locating and mapping training.

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

SLR Notes:

No issues

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

SLR Notes:

NAPSR sharing. No issues

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

SLR Notes:

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

PART I - Program Initiatives

	Points(MAX)	Score

Drug and Alcohol Testing (49 CFR Part 199)

1 Has the state verified that operators have drug and alcohol testing programs? — 1 — 1

Yes = 1 No = 0

SLR Notes:

No issues

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2 Is the state verifying that operators are conducting the drug and alcohol tests required by the operators program (random, post-incident, etc.) — .5 — 0.5

Yes = .5 No = 0

SLR Notes:

No issues, Questar full review CY2010.

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3 Is the state verifying that any positive tests are responded to in accordance with the operator's program? — .5 — 0.5

Yes = .5 No = 0

SLR Notes:

No issues

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

4 Has the state verified that operators have a written qualification program? — 1 — 1

Yes = 1 No = 0

SLR Notes:

Yes, but recommend they do comprehensive plan review of OQ plans.

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5 Has the state reviewed operator qualification programs for compliance with PHMSA rules and protocols? — .5 — 0.5

Yes = .5 No = 0

SLR Notes:

Yes, again recommend time for another full review

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6 Is the state verifying that persons who perform covered tasks for the operator are qualified in accordance with the operator's program? — .5 — 0.5

Yes = .5 No = 0

SLR Notes:

Continual evaluations in this area. No issues.

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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? — .5 — 0.5

Yes = .5 No = 0

SLR Notes:

No issues. This should be addressed in comprehensive review with operators.

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? — 1 — 1

Yes = 1 No = 0

SLR Notes:

It appears initial reviews have been done, but recommend they do thorough evaluation on status of IMP plans to ensure compliance. Informed points will be lost during next evaluation if analysis is not complete.

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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? — .5 — 0.5

Yes = .5 No = 0

SLR Notes:

Questar appears to be only affected company and no current issues.

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10 Has the state reviewed operator IMPs for compliance with Subpart O? (In accordance with State Inspection plan) .5 0.5

Yes = .5 No = 0

SLR Notes:

See above, no issues at this time.

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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? .5 0.5

Yes = .5 No = 0

SLR Notes:

State is receiving regular correspondence and reviewing Questar IMP progress.

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12 Is the state verifying that operators are periodically examining their transmission line routes for the appearance of new HCAs? .5 0.5

Yes = .5 No = 0

SLR Notes:

No issues, but comprehensive review should be completed.

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) .5 0.5

Yes = .5 No = 0

SLR Notes:

No issues

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14 Has the state reviewed the content of these programs for compliance with 192.616 (by participating in the Clearinghouse or by other means)? .5 0.5

Yes = .5 No = 0

SLR Notes:

No issues

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15 Is the state verifying that operators are conducting the public awareness activities called for in its program? .5 0.5

Yes = .5 No = 0

SLR Notes:

No issues

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16 Is the state verifying that operators have evaluated their Public Awareness programs for effectiveness as described in RP1162? Info Only Info Only

Info Only = No Points

SLR Notes:

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17 Part I: General Comments/Regional Observations Info Only Info Only

Info Only = No Points

SLR Notes:

Total points scored for this section: 9

Total possible points for this section: 9