

## Abbreviated Form 1

### STANDARD INSPECTION REPORT OF A GAS TRANSMISSION PIPELINE

Unless otherwise noted, all code references are to 49CFR Part 192. S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked  
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

A completed **Standard Inspection Report** is to be submitted to the Director within 60 days from completion of the inspection. A **Post Inspection Memorandum (PIM)** is to be completed and submitted to the Director within 30 days from the completion of the inspection, or series of inspections, and is to be filed as part of the **Standard Inspection Report**.

Inspection Report	Post Inspection Memorandum	
Inspector/Submit Date: S. Rukke 5/19/2011	Chief Eng/Review Date: Peer Review/Date: Director Approval/Date:	D. Lykken 5/20/2011
<b>POST INSPECTION MEMORANDUM (PIM)</b>		
Name of Operator: Puget Sound Energy		OPID #: 22189
Name of Unit(s): Jackson Prairie Storage Facility		Unit #(s): 33875
Records Location: Jackson Prairie Storage Facility		Activity #
Unit Type & Commodity: Interstate Natural Gas Storage		
Inspection Type: Standard		Inspection Date(s): March 29 – 31, 2011, and April 20, 2011
PHMSA Representative(s): Scott Rukke, UTC, Lex Vinsel. UTC (Lex not present during April 20 insp.)		AFO Days: 7

<b>Company System Maps</b> (copies for Region Files):	
Validate SMART Data (components, miles, etc): <input type="checkbox"/>	Acquisition(s), Sale or New Construction (submit SMART update): <input type="checkbox"/>
Validate Additional Requirements Resulting From Waiver(s) or Special Permit(s):	

**Summary:**  
Natural gas is transported from Williams Pipeline to the Jackson Prairie Storage via underground piping through 4, 6, 8, 14, 16, 20, and 24-inch diameter pipes each approximately 9,032 feet in length. When gas is returned to the Williams Pipeline it is scrubbed of debris such as sand and water before being compressed to line pressure. A review of records included: cathodic protection for plant piping and transmission pipeline including casings and rectifiers, maintenance of valves, pressure recording data, emergency plan, safety related condition reports, and welding results. Field inspection included: wellhead piping, compressor building fire eye detectors and gas monitors, CP for piping and rectifiers, ROW, firefighting equipment, pipe supports, facility security, and the SCADA system.

**Findings:**  
Two probable violations were noted for the following areas:

1. 192.731(a), *Compressor Station Relief Devices (1 per yr/15 months)*  
Station over pressure relief valves 76, 44 and 43 were not operated during calendar year 2009 and exceeded 15 months between operation.
2. 192.483 & 192.485, *Remedial: Replaced or Repaired Pipe; coated and protected; corrosion evaluation and actions.*  
PSE procedure 4515.1760 requires engineering notification for pits over a certain depth as outlined in PSE's O&M manual. PSE's engineering department will then determine follow up requirements. At the time of this inspection, several areas of localized pitting were found under the wrap located at the pipe to soil interface of some pipe risers. These pits had a depth greater than that requiring engineering notification. Records were not available indicating that notification was done. This is a probable violation of 192.13(c), failure to follow PSE's procedure 4515.1760.

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<b>Name of Operator:</b> Puget Sound Energy		<b>Unit ID No.</b> <sup>(1)</sup>	
<b>OP ID No.</b> <sup>(1)</sup> 22189		<b>System/Unit Name &amp; Address:</b> <sup>(1)</sup>	
<b>HQ Address:</b> Puget Sound Energy PO Box 90868 M/S PSE-12N Bellevue, WA 98009-0868		Puget Sound Energy Jackson Prairie Natural Gas Storage Facility 239 Zandecki Rd Chehalis, WA 98532	
<b>Co. Official:</b>	Sue McLain Senior Vice President, Delivery Operations	<b>Activity Record ID No.:</b>	
<b>Phone No.:</b>	(425) 462-3696	<b>Phone No.:</b>	
<b>Fax No.:</b>		<b>Fax No.:</b>	
<b>Emergency Phone No.:</b>	800-552-7171	<b>Emergency Phone No.:</b>	
<b>Persons Interviewed</b>		<b>Title</b>	
Jim Janson		Manager, Jackson Prairie	
Darryl Hong		Compliance Coordinator	
Toni Imad		Engineer	
Rick Braaten		Plant Supervisor	
<b>PHMSA Representative(s)</b> <sup>(1)</sup>			<b>Inspection Date(s)</b> <sup>(1)</sup>
<b>Company System Maps (Copies for Region Files):</b>			

<b>Unit Description:</b>	See Gas Storage Field Review report.
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<b>Portion of Unit Inspected:</b> <sup>(1)</sup>	See Gas Storage Field Review report.
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<sup>1</sup> Information not required if included on page 1.

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For gas transmission pipeline inspections, the attached evaluation form should be used in conjunction with 49 CFR 191 and 192 during PHMSA inspections. For those operators, procedures do not have to be evaluated for content unless: 1) new or amended regulations have been placed in force after the team inspection, or 2) procedures have changed since the team inspection. Items in the procedures sections of this form identified with "\*" reflect applicable and more restrictive new or amended regulations that became effective between 03/16/05 and 03/19/10.

**This form may be used in lieu of Form 1 if the operator's procedures were inspected by the region within the prior year, or if the operator has received a Team O&M Inspection within the past five years.**

**Operator's procedures reviewed during the previous inspection (enter previous inspection date below) may be marked with a "1" in the N/C column.**

**(check applicable box and enter inspection date)**

X	Team inspection of the operator's O & M Manual was performed:	Date:	11/14/2005
	Region inspection of the operator's O & M Manual was performed:	Date:	

#### 49 CFR PART 192

.605(a)	CHANGE in CLASS LOCATION PROCEDURES	S	U	N/A	N/C
*	.611 Confirmation or revision of MAOP. Final Rule Pub. 10/17/08, eff. 12/22/08.				1

**Comments:**

Note 1: This item was reviewed in the O & M Manual since the effective date of the applicable amendment.

PUBLIC AWARENESS PROGRAM PROCEDURES (Also in accordance with API RP 1162)			S	U	N/A	N/C
.605(a)	*	.616 Public Awareness Program also in accordance with API RP 1162. Amdt 192-99 pub. 5/19/05 eff. 06/20/05.				
		.616(d) The operator's program must specifically include provisions to educate the public, appropriate government organizations, and persons engaged in excavation related activities on:				
		(1) Use of a one-call notification system prior to excavation and other damage prevention activities;				1
		(2) Possible hazards associated with unintended releases from a gas pipeline facility;				1
		(3) Physical indications of a possible release;				1
		(4) Steps to be taken for public safety in the event of a gas pipeline release; and				1
		(5) Procedures to report such an event (to the operator).				1
		.616(e) The operator's program must include activities to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations.				1
		.616(f) The operator's program and the media used must be comprehensive enough to reach all areas in which the operator transports gas.				1
		.616(g) The program conducted in English and any other languages commonly understood by a significant number of the population in the operator's area?				1
		.616(h) IAW API RP 1162, the operator's program should be reviewed for effectiveness within four years of the date the operator's program was first completed. <u>For operators in existence on June 20, 2005</u> , who must have completed their written programs no later than June 20, 2006, the first evaluation is due no later than <b>June 20, 2010</b> .	X			

**Comments:**

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**Comments:**

Note 1: This item was reviewed in the O & M Manual since the effective date of the applicable amendment.

.605(a)	MAOP PROCEDURES	S	U	N/A	N/C													
	<b>Note: If the operator is operating under a Special Permit, a Waiver or 192.620, the inspector needs to review the special conditions of the Special Permit, Waiver or refer to Attachment 1 for additional .620 requirements.</b>																	
	.619 Establishing MAOP so that it is commensurate with the class location			X														
	<b>MAOP cannot exceed the lowest of the following:</b>																	
*	(a)(1) Design pressure of the weakest element, Amdt. 192-103 pub. 06/09/06, eff. 07/10/06			X														
*	(a)(3) The highest actual operating pressure to which the segment of line was subjected during the 5 years preceding the applicable date in second column, unless the segment was tested according to .619(a)(2) after the applicable date in the third column or the segment was uprated according to subpart K. Amdt 192-102 pub. 3/15/06, eff. 04/14/06. <b>For gathering line related compliance deadlines and additional gathering line requirements, refer to Part 192 including this amendment.</b>																	
	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%;">Pipeline segment</th> <th style="width: 20%;">Pressure date</th> <th style="width: 30%;">Test date</th> </tr> </thead> <tbody> <tr> <td>--Onshore gathering line that first became subject to this part (other than § 192.612) after April 13, 2006.</td> <td rowspan="2" style="text-align: center;">March 15, 2006, or date line becomes subject to this part, whichever is later.</td> <td rowspan="2" style="text-align: center;">5 years preceding applicable date in second column.</td> </tr> <tr> <td>-- Onshore transmission line that was a gathering line not subject to this part before March 15, 2006.</td> </tr> <tr> <td>Offshore gathering lines.</td> <td style="text-align: center;">July 1, 1976.</td> <td style="text-align: center;">July 1, 1971.</td> </tr> <tr> <td>All other pipelines.</td> <td style="text-align: center;">July 1, 1970.</td> <td style="text-align: center;">July 1, 1965.</td> </tr> </tbody> </table>	Pipeline segment	Pressure date	Test date	--Onshore gathering line that first became subject to this part (other than § 192.612) after April 13, 2006.	March 15, 2006, or date line becomes subject to this part, whichever is later.	5 years preceding applicable date in second column.	-- Onshore transmission line that was a gathering line not subject to this part before March 15, 2006.	Offshore gathering lines.	July 1, 1976.	July 1, 1971.	All other pipelines.	July 1, 1970.	July 1, 1965.			X	
Pipeline segment	Pressure date	Test date																
--Onshore gathering line that first became subject to this part (other than § 192.612) after April 13, 2006.	March 15, 2006, or date line becomes subject to this part, whichever is later.	5 years preceding applicable date in second column.																
-- Onshore transmission line that was a gathering line not subject to this part before March 15, 2006.																		
Offshore gathering lines.	July 1, 1976.	July 1, 1971.																
All other pipelines.	July 1, 1970.	July 1, 1965.																
*	(c) The requirements on pressure restrictions in this section do not apply in the following instance. An operator may operate a segment of pipeline found to be in satisfactory condition, considering its operating and maintenance history, at the highest actual operating pressure to which the segment was subjected during the 5 years preceding the applicable date in the second column of the table in paragraph (a)(3) of this section. An operator must still comply with § 192.611. Amdt 192-102 pub. 3/15/06, eff. 04/14/06. <b>For gathering line related compliance deadlines and additional gathering line requirements, refer to Part 192 including this amendment.</b>			X														
*	.620 Refer to Attachment 1 for additional Alternative MAOP requirements. Amdt. 192-111 pub. 11/30/09, eff. 1/29/2010.																	

**Comments:**

Note: PSE does not utilize the alternative maop

.605(b)	RECORD KEEPING PROCEDURES	S	U	N/A	N/C
	.709 Records must be maintained:				
	(a) Repairs to the pipe – life of system <b>2575.1700</b>				1
	(b) Repairs to "other than pipe" – 5 years <b>2575.1700</b>				1

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.605(b)	RECORD KEEPING PROCEDURES	S	U	N/A	N/C
	(c) Operation (Sub L) and Maintenance (Sub M) patrols, surveys, tests – <b>5 years</b> or until next				1
	2575.3100				

**Comments:**

Note 1: This item was reviewed in the O & M Manual since the effective date of the applicable amendment.

.605(b)	ABANDONMENT or DEACTIVATION of FACILITIES PROCEDURES	S	U	N/A	N/C
*	.727 (g) Operator must file reports upon abandoning underwater facilities crossing navigable waterways, including offshore facilities. Amdt. 192-103 corr. pub 02/01/07, eff. 03/05/07.			X	

**Comments:**

.727 (g): No underwater facilities.

.605(b)	COMPRESSOR STATION PROCEDURES	S	U	N/A	N/C
*	.735 (b) Tank must be protected according to <b>NFPA #30</b> ; Amdt 192-103 pub. 06/09/06 eff. 07/10/06. Includes on site flammables inside compressor buildings.				1

**Comments:**

Note 1: This item was reviewed in the O & M Manual since the effective date of the applicable amendment.

.13(c)	WELDING AND WELD DEFECT REPAIR/REMOVAL PROCEDURES	S	U	N/A	N/C
*	.225 (a) Welding procedures must be qualified under <b>Section 5 of API 1104</b> or <b>Section IX of ASME Boiler and Pressure Code</b> by destructive test. Amdt. 192-103 pub 06/09/06, eff. 07/10/06. <b>4900.1000</b>	X			
	Note: Alternate welding procedures criteria are addressed in API 1104 Appendix A, section A.3.				
*	.227 (a) Welders must be qualified by <b>Section 6 of API 1104 (19th Ed., 1999, including errata October 31, 2001; and 20<sup>th</sup> edition 2007, including errata 2008)</b> or <b>Section IX of ASME Boiler and Pressure Code</b> (2004 ed. Including addenda through July 1, 2005) See exception in .227(b). Amdt. 192-103 pub 06/09/06, eff. 07/10/06; Amdt. 192-103 corr. Pub 02/01/07 eff. 03/05/07; Amdt 195-91 Pub. 4/14/09 eff. 4/14/09.	X			
	<i>Note: Operator's procedures must specify the edition of API 1104 they are using. Operator may not use both editions, and procedures must be consistent with the edition used.</i>				

**Comments:**

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**Comments:**

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.273(b)	JOINING of PIPELINE MATERIALS	S	U	N/A	N/C
*	.283 Qualified joining procedures for plastic pipe must be in place. Amdt. 192-103 pub. 06/09/06, eff. 07/10/06.			X	

**Comments:**

Note 1: This item was reviewed in the O & M Manual since the effective date of the applicable amendment.  
.283: No plastic pipe.

.605(b)	CORROSION CONTROL PROCEDURES	S	U	N/A	N/C
*	.476 Systems designed to reduce internal corrosion (a) New construction Final Rule Pub. 4/23/07, eff. 5/23/07. <b>Drip installed on the new 24"</b> .	X			
*	(b) Exceptions – offshore pipeline and systems replaced before 5/23/07 Final Rule Pub. 4/23/07, eff. 5/23/07.			X	
*	(c) Evaluate impact of configuration changes to existing systems Final Rule Pub. 4/23/07, eff. 5/23/07. <b>Drip installed on the new 24". No liquids found.</b>	X			

**Comments:**

.476 (b): No offshore pipelines.

.801- .809	<b>Subpart N — Qualification of Pipeline Personnel Procedures</b>
	Operator Qualification Inspection – Use PHMSA Form # 14 as applicable

.901- .951	<b>Subpart O — Pipeline Integrity Management</b>
	This form does not cover Gas Pipeline Integrity Management Programs

Subparts A - C	<b>PART 199 – DRUG and ALCOHOL TESTING REGULATIONS and PROCEDURES</b>
	Drug & Alcohol Testing & Alcohol Misuse Prevention Program – Use PHMSA Form # 13, PHMSA Drug and Alcohol Program Check.

**Comments:**

	PIPELINE INSPECTION (Field)	S	U	N/A	N/C
.179	Valve Protection from Tampering or Damage	X			

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PIPELINE INSPECTION (Field)		S	U	N/A	N/C
.463	Cathodic Protection	X			
.465	Rectifiers	X			
.476	Systems designed to reduce internal corrosion	X			
.479	Pipeline Components Exposed to the Atmosphere	X			
.605	Knowledge of Operating Personnel	X			
.612 (c) (2)	Pipelines exposed on seabed (Gulf of Mexico and Inlets): Marking			X	
.613(b), .703	Pipeline condition, unsatisfactory conditions, hazards, etc.	X			
.707	ROW Markers, Road and Railroad Crossings	X			
.719	Pre-pressure Tested Pipe ( <b>Markings and Inventory</b> )	X			
.739/.743	Pressure Limiting and Regulating Devices (spot-check field installed equipment vs. inspection records)	X			
.745	Valve Maintenance	X			
.751	Warning Signs	X			
.801 - .809	Operator Qualification - Use PHMSA Form 15 Operator Qualification Field Inspection Protocol Form	X			

**Comments:**

.612 (c)(2): No Gulf of Mexico pipelines.

COMPRESSOR STATIONS INSPECTION (Field)		S	U	N/A	N/C
(Note: Facilities may be "Grandfathered")					
.163 (c)	Main operating floor must have (at least) two (2) separate and unobstructed exits	X			
	Door latch must open from inside without a key	X			
	Doors must swing outward	X			
(d)	Each fence around a compressor station must have (at least) 2 gates or other facilities for emergency exit	X			
	Each gate located within 200 ft of any compressor plant building must open outward	X			
	When occupied, the door must be opened from the inside without a key	X			
(e)	Does the equipment and wiring within compressor stations conform to the <b>National Electric Code, ANSI/NFPA 70?</b>	X			
.165(a)	If applicable, are there liquid separator(s) on the intake to the compressors?	X			
.165(b)	Do the liquid separators have a manual means of removing liquids?	X			
	If slugs of liquid could be carried into the compressors, are there automatic dumps on the separators, Automatic compressor shutdown devices, or high liquid level alarms?	X			
.167(a)	ESD system must:				
	- Discharge blowdown gas to a safe location	X			
	- Block and blowdown the gas in the station	X			
	- Shut down gas compressing equipment, gas fires, electrical facilities in compressor building and near gas headers	X			
	- Maintain necessary electrical circuits for emergency lighting and circuits needed to protect equipment from damage	X			
	ESD system must be operable from at least two locations, each of which is:				
	- Outside the gas area of the station	X			
	- Not more than 500 feet from the limits of the station	X			
	- ESD switches near emergency exits?	X			

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<b>COMPRESSOR STATIONS INSPECTION (Field)</b>		S	U	N/A	N/C
(Note: Facilities may be “Grandfathered”)					
.167 (b)	For stations supplying gas directly to distribution systems, is the ESD system configured so that the LDC will not be shut down if the ESD is activated?	X			
.167(c)	Are ESDs on platforms designed to actuate automatically by...				
	- For unattended compressor stations, when:				
	▪ The gas pressure equals MAOP plus 15%?			X	
	▪ An uncontrolled fire occurs on the platform?			X	
	- For compressor station in a building, when				
	▪ An uncontrolled fire occurs in the building?			X	
▪ Gas in air reaches 50% or more of LEL in a building with a source of ignition (facility conforming to <b>NEC Class 1, Group D</b> is not a source of ignition)?					
.171(a)	Does the compressor station have adequate fire protection facilities? If fire pumps are used, they must not be affected by the ESD system.	X			
(b)	Do the compressor station prime movers (other than electrical movers) have over-speed shutdown?	X			
(c)	Do the compressor units alarm or shutdown in the event of inadequate cooling or lubrication of the unit(s)?	X			
(d)	Are the gas compressor units equipped to automatically stop fuel flow and vent the engine if the engine is stopped for any reason?	X			
(e)	Are the mufflers equipped with vents to vent any trapped gas?	X			
.173	Is each compressor station building adequately ventilated?	X			
.457	Is all buried piping cathodically protected?	X			
.481	Atmospheric corrosion of aboveground facilities	X			
.603	Does the operator have procedures for the start-up and shut-down of the station and/or compressor units?	X			
	Are facility maps current/up-to-date?	X			
.615	Emergency Plan for the station on site?	X			
.707	Markers	X			
.731	Overpressure protection – reliefs or shutdowns	X			
.735	Are combustible materials in quantities exceeding normal daily usage, stored a safe distance from the compressor building?	X			
	Are aboveground oil or gasoline storage tanks protected in accordance with <b>NFPA standard No. 30?</b>	X			
.736	Gas detection – location	X			

**Comments:**

.167(c): No facilities located on offshore platforms.

<b>CONVERSION TO SERVICE PERFORMANCE and RECORDS</b>		S	U	N/A	N/C
.14 (a)(2)	Visual inspection of right of way, aboveground and selected underground segments			X	
(a)(3)	Correction of unsafe defects and conditions			X	
(a)(4)	Pipeline testing in accordance with Subpart J			X	
(b)	Pipeline records: investigations, tests, repairs, replacements, alterations (life of pipeline)			X	

<b>REPORTING PERFORMANCE and RECORDS</b>		S	U	N/A	N/C
191.5	Telephonic reports to NRC (800-424-8802)			X	
191.15	Written incident reports; supplemental incident reports (DOT Form RSPA F 7100.2)			X	



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REPORTING PERFORMANCE and RECORDS		S	U	N/A	N/C
191.17 (a)	Annual Report (DOT Form RSPA F 7100.2-1)	X			
191.23	Safety related condition reports			X	
191.27	Offshore pipeline condition reports			X	
192.727 (g)	Abandoned facilities offshore, onshore crossing commercially navigable waterways reports			X	

CONSTRUCTION PERFORMANCE and RECORDS		S	U	N/A	N/C
.225	Test Results to Qualify Welding Procedures	X			
.227	Welder Qualification	X			
.241 (a)	Visual Weld Inspector Training/Experience <b>Reviewed Inspectors certifications.</b>	X			
.243 (b)(2)	Nondestructive Technician Qualification <b>Washington Oregon Laboratories</b>	X			
(c)	NDT procedures <b>OWL-RT-001 and OWL-RT-100</b>	X			
(f)	Total Number of Girth Welds	X			
(f)	Number of Welds Inspected by NDT	X			
(f)	Number of Welds Rejected	X			
(f)	Disposition of each Weld Rejected <b>All welds were repaired per records.</b>	X			
.303	Construction Specifications	X			
.325	Underground Clearance	X			
.327	Amount, Location, Cover of each Size of Pipe Installed	X			
.328	If the pipeline will be operated at the alternative MAOP standard calculated under 192.620 (80% SMYS) refer to PHMSA Form 5 (Construction) for additional construction requirements			X	
.455	Cathodic Protection	X			

OPERATIONS and MAINTENANCE PERFORMANCE and RECORDS		S	U	N/A	N/C
.16	Customer Notification ( <b>Verification – 90 days – and Elements</b> )			X	
.603(b)	.605(a) Procedural Manual Review – Operations and Maintenance ( <b>1 per yr/15 months</b> )	X			
.603(b)	.605(c) Abnormal Operations <b>None in the last 2 years.</b>			X	
.603(b)	.605(b)(3) Availability of construction records, maps, operating history to operating personnel	X			
.603(b)	.605(b)(8) Periodic review of personnel work – effectiveness of normal O&M procedures	X			
.603(b)	.605(c)(4) Periodic review of personnel work – effectiveness of abnormal operation procedures <b>Form 4028</b>	X			
.709	.609 Class Location Study ( <b>If Applicable</b> ) <b>Reviewed to 2007, one class 2 location.</b>	X			
.603(b)	.612(b) Gulf of Mexico/inlets: Periodic underwater inspections based on the identified risk			X	
.709	.614 Damage Prevention ( <b>Miscellaneous</b> )	X			
.603(b)	.615(b)(1) Location Specific Emergency Plan	X			
.603(b)	.615(b)(2) Emergency Procedure training, verify effectiveness of training	X			
.603(b)	.615(b)(3) Employee Emergency activity review, determine if procedures were followed. <b>No emergencies since last meeting.</b>			X	
.603(b)	.615(c) Liaison Program with Public Officials	X			
.603(b)	.616 Public Awareness Program				
	.616(e & f) Documentation properly and adequately reflects implementation of operator’s Public Awareness Program requirements - Stakeholder Audience identification, message type and content, delivery method and frequency, supplemental enhancements, program evaluations, etc. (i.e. contact or mailing rosters, postage receipts, return receipts, audience contact documentation, etc. for emergency responder, public officials, school superintendents, program evaluations, etc.). See table below:	X			
	<b>API RP 1162 Baseline* Recommended Message Deliveries</b>				
	<b>Stakeholder Audience (Natural Gas Transmission Line Operators)</b>				

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OPERATIONS and MAINTENANCE PERFORMANCE and RECORDS			S	U	N/A	N/C												
		<b>Baseline Message Frequency (starting from effective date of Plan)</b>																
		Residents Along Right-of-Way and Places of Congregation	2 years	Good														
		Emergency Officials	Annual															
		Public Officials	3 years															
		Excavator and Contractors	Annual	Good														
		One-Call Centers	As required of One-Call Center	Good														
		<b>Stakeholder Audience (Gathering Line Operators)</b>	<b>Baseline Message Frequency</b>															
		Residents and Places of Congregation	Annual															
		Emergency Officials	Annual															
		Public Officials	3 years															
		Excavators and Contractors	Annual															
		One-Call Centers	As required of One-Call Center															
		* Refer to API RP 1162 for additional requirements, including general program recommendations, supplemental requirements, recordkeeping, program evaluation, etc.																
	.616(g)	The program must be conducted in English and any other languages commonly understood by a significant number of the population in the operator's area.	X															
	.616(h)	Effectiveness Review of operator's program.	X															
.517		Pressure Testing	X															
.553(b)		Upgrading			X													
.709	.619 / .620	Maximum Allowable Operating Pressure (MAOP) If the pipeline is operating at the alternative MAOP under 192.620 (80% SMYS), refer to Attachment 1 for additional requirements.			X													
.709	.625	Odorization of Gas			X													
.709	.705	Patrolling (Refer to Table Below)	X															
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%;">Class Location</th> <th style="width: 35%;">At Highway and Railroad Crossings</th> <th style="width: 35%;">At All Other Places</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">1 and 2</td> <td style="text-align: center;">2/yr (7½ months)</td> <td style="text-align: center;">1/yr (15 months)</td> </tr> <tr> <td style="text-align: center;">3</td> <td style="text-align: center;">4/yr (4½ months)</td> <td style="text-align: center;">2/yr (7½ months)</td> </tr> <tr> <td style="text-align: center;">4</td> <td style="text-align: center;">4/yr (4½ months)</td> <td style="text-align: center;">4/yr (4½ months)</td> </tr> </tbody> </table>							Class Location	At Highway and Railroad Crossings	At All Other Places	1 and 2	2/yr (7½ months)	1/yr (15 months)	3	4/yr (4½ months)	2/yr (7½ months)	4	4/yr (4½ months)	4/yr (4½ months)
Class Location	At Highway and Railroad Crossings	At All Other Places																
1 and 2	2/yr (7½ months)	1/yr (15 months)																
3	4/yr (4½ months)	2/yr (7½ months)																
4	4/yr (4½ months)	4/yr (4½ months)																
.709	.706	Leak Surveys (Refer to Table Below)	X															
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%;">Class Location</th> <th style="width: 35%;">Required</th> <th style="width: 35%;">Not Exceed</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">1 and 2</td> <td style="text-align: center;">1/yr</td> <td style="text-align: center;">15 months</td> </tr> <tr> <td style="text-align: center;">3</td> <td style="text-align: center;">2/yr*</td> <td style="text-align: center;">7½ months</td> </tr> <tr> <td style="text-align: center;">4</td> <td style="text-align: center;">4/yr*</td> <td style="text-align: center;">4½ months</td> </tr> </tbody> </table> <p>* Leak detector equipment survey required for lines transporting un-odorized gas.</p>							Class Location	Required	Not Exceed	1 and 2	1/yr	15 months	3	2/yr*	7½ months	4	4/yr*	4½ months
Class Location	Required	Not Exceed																
1 and 2	1/yr	15 months																
3	2/yr*	7½ months																
4	4/yr*	4½ months																
.709	.731(a)	Compressor Station Relief Devices (1 per yr/15 months) Missed #76, 44 and 43		X														
.709	.731(c)	Compressor Station Emergency Shutdown (1 per yr/15 months)	X															
.709	.736(c)	Compressor Stations – Detection and Alarms (Performance Test)	X															
.709	.739	Pressure Limiting and Regulating Stations (1 per yr/15 months)			X													
.709	.743	Pressure Limiting and Regulator Stations – Capacity (1 per yr/15 months)			X													
.709	.745	Valve Maintenance (1 per yr/15 months)	X															
.709	.749	Vault Maintenance (≥ 200 cubic feet)(1 per yr/15 months)			X													
.603(b)	.751	Prevention of Accidental Ignition (hot work permits) Reviewed 2009 and 2010	X															
.603(b)	.225(b)	Welding – Procedure	X															

## Abbreviated Form 1

# STANDARD INSPECTION REPORT OF A GAS TRANSMISSION PIPELINE

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OPERATIONS and MAINTENANCE PERFORMANCE and RECORDS				S	U	N/A	N/C
.603(b)	.227/.229	Welding – Welder Qualification	Welders are PSE qualified. No welders on site.	X			
.603(b)	.243(b)(2)	NDT – NDT Personnel Qualification	NDT testers are PSE qualified.	X			
.709	.243(f)	NDT Records (Pipeline Life)		X			
.709	Repair: pipe (Pipeline Life); Other than pipe (5 years)			X			
.807(b)	Refer to PHMSA Form # 15 to document review of operator's employee covered task records						

**Comments:**

- .14 (a)(2)(3)(4) and (b): No conversion to service facilities.
- 191.5: No NRC incidents since last inspection.
- 191.15: No incidents since last inspection.
- 191.23: No safety related conditions since last inspection.
- 191.27: No offshore pipelines.
- 192.727 (g): No offshore or navigable waterway facilities.
- .328: No alternative maop facilities.
- .16: No customers.
- .603(b): No abnormal operations since last inspection.
- .603(b): No Gulf of Mexico facilities.
- .603(b): No emergencies since last inspection.
- .553(b): No uprates.
- .619 / .620: No Alternative maop used.
- .625: No odorized gas.
- .731(a): Violation noted. Relief valves #76, #44 and #43 were not operated in calendar year 2009 and exceeded 15 months between testing.**
- .739: No Regulating stations.
- .743: No Regulating stations.
- .749: No vaults meeting this requirement.

CORROSION CONTROL PERFORMANCE and RECORDS				S	U	N/A	N/C
.453		CP procedures (system design, installation, operation, and maintenance) must be carried out by qualified personnel		X			
.491	.491(a)	Maps or Records		X			
.491	.459	Examination of Buried Pipe when Exposed		X			
.491	.465(a)	Annual Pipe-to-soil Monitoring (1 per yr/15 months) or short sections (10 % per year, all in 10 years)		X			
.491	.465(b)	Rectifier Monitoring (6 per yr/2½ months)		X			
.491	.465(c)	Interference Bond Monitoring – Critical (6 per yr/2½ months)				X	
.491	.465(c)	Interference Bond Monitoring – Non-critical (1 per yr/15 months)				X	
.491	.465(d)	Prompt Remedial Actions		X			
.491	.465(e)	Unprotected Pipeline Surveys, CP active corrosion areas (1 per 3 cal yr/39 months)				X	
.491	.467	Electrical Isolation (Including Casings)		X			
.491	.469	Test Stations – Sufficient Number		X			
.491	.471	Test Leads		X			
.491	.473	Interference Currents				X	
.491	.475(a)	Internal Corrosion; Corrosive Gas Investigation		X			
.491	.475(b)	Internal Corrosion; Internal Surface Inspection; Pipe Replacement		X			
.491	.476 (c)	Internal Corrosion; New system design; Evaluation of impact of configuration changes to existing systems <b>New drip added to 24" in 2008</b>		X			
.491	.477	Internal Corrosion Control Coupon Monitoring (2 per yr/7½ months)		X			
.491	.481	Atmospheric Corrosion Control Monitoring (1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore)		X			
.491	.483/.485	Remedial: Replaced or Repaired Pipe; coated and protected; corrosion evaluation and actions <b>Follow up on atmospheric corrosion requires engineering notification if over a certain depth 4515.1760</b>			X		

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**Comments:**

.465(c): No interference bonds.

.465(c): “ “ “ “

.465(e): No unprotected pipelines.

.473: No interference currents.

**.483/.485: Violation noted for this requirement. See violation report.**

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### Attachment 1 Alternative Maximum Allowable Operating Pressure

For additional guidance refer to <http://primis.phmsa.dot.gov/maop/faqs.htm>  
For Additional guidance see the FAQs at <http://primis.phmsa.dot.gov/maop/faqs.htm>

192.620	Alternative MAOP Procedures and Verifications	S	U	N/A	N/C								
	The alternative MAOP is calculated by using different factors in the same formulas used for calculating MAOP in §192.619. In determining the alternative design pressure under §192.105 use a design factor determined in accordance with §192.111(b), (c), or (d), or, if none of these apply in accordance with:												
	<table style="margin-left: auto; margin-right: auto;"> <tr> <td style="padding-right: 20px;">Class Location</td> <td>Alternative Design Factor (F)</td> </tr> <tr> <td style="padding-right: 20px;">1</td> <td>0.80</td> </tr> <tr> <td style="padding-right: 20px;">2</td> <td>0.67</td> </tr> <tr> <td style="padding-right: 20px;">3</td> <td>0.56</td> </tr> </table>	Class Location	Alternative Design Factor (F)	1	0.80	2	0.67	3	0.56				
Class Location	Alternative Design Factor (F)												
1	0.80												
2	0.67												
3	0.56												
.620(a)	(1) Establish alternative MAOP commensurate with class location – no class 4			X									
	(2) MAOP cannot exceed the lowest of the following:												
	(i) Design pressure of the weakest element			X									
	(ii) Test pressure divided by applicable factor			X									
.620(b)	(2) Pipeline constructed of steel pipe meeting additional requirements in §192.112.			X									
	(3) SCADA system with remote monitoring and control			X									
	(4) Additional construction requirements described in §192.328			X									
	(5) No mechanical couplings			X									
	(6) No failures indicative of systemic material fault – if previously operated at lower MAOP			X									
	(7) 95% of girth welds have NDT			X									
	.620(c)	(1) PHMSA notified 180 days before operating at alternative MAOP			X								
(2) Senior Executive signatures and copy to PHMSA				X									
(4) Strength test per §192.505 or certify previous strength test				X									
(6) Construction tasks treated as covered tasks for Operator Qualification				X									
(7) Records maintained for life of system				X									
(8) Class location change anomaly remediations				X									
.620(d)		(1) Threat matrix developed consistent with §192.917			X								
		(2) Recalculate the potential impact circle per §192.903 and implement public education per §192.616			X								
	(3) Responding to an emergency in an HCA												
	(i) Identify HCAs using larger impact circle			X									
	(ii) Check personnel response times			X									
	(iii) Verify remote valve abilities			X									
	(iv) Verify line break valve control system			X									
	(4) Protect the right-of-way:												
	(i) ROW patrols 12 per year not to exceed 45 days			X									
	(ii) Plan to identify and mitigate unstable soil			X									
	(iii) Replace loss of cover if needed			X									
	(iv) Use line-of-sight markers per §192.707			X									
	(v) Review damage prevention program in light of national consensus practices			X									
	(vi) ROW management plan to protect against excavation activities			X									
	(5) Control Internal Corrosion:												

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	Alternative MAOP Procedures and Verifications	S	U	N/A	N/C
192.620	(i) Program to monitor gas constituents			X	
	(ii) Filter separators if needed			X	
	(iii) Gas Monitoring equipment used			X	
	(iv) Cleaning pigs, inhibitors, and sample accumulated liquids				
.620(d)	(v) Limit CO <sub>2</sub> , H <sub>2</sub> S, and water in the gas stream			X	
	(vi) Quarterly program review based on monitoring results			X	
	(6) (i) Control interference that can impact external corrosion			X	
	(ii) Survey to address interference currents and remedial actions			X	
	(7) Confirm external corrosion control through indirect assessment			X	
	(i) Assess adequacy of CIS and perform DCVG or ACVG within 6 months				
	(ii) Remediate damage with IR drop > 35%			X	
	(iii) Integrate internal inspection results with indirect assessment			X	
	(iv) Periodic assessments for HCAs			X	
	(A-C) Close interval surveys, test stations at ½ mile intervals, and integrate results				
	(8) Cathodic Protection			X	
	(i) Complete remediations within 6 months of failed reading				
	(ii) Confirm restoration by a close interval survey			X	
	(iii) Cathodic protection system operational within 12 months of construction completion			X	
	(9) Baseline assessment of integrity			X	
	(i)(A) Geometry tool run within 6 months of service				
	(i)(B) High resolution MFL tool run within 3 years of service			X	
	(ii) Geometry and MFL tool 2 years prior to raising pressure for existing lines			X	
	(iii) If short portions cannot accommodate tools, use direct assessment per §192.925, 927, 929 or pressure testing			X	
	(10) Periodic integrity assessments			X	
	(i) Frequency for assessments determined as if all segments covered by Subpart O				
	(ii) Inspect using MFL tool or direct assessment per §192.925, 927, 929 or pressure testing.			X	
	(11) Repairs			X	
	(i)(A) Use of the most conservative calculation for anomaly remaining strength				
	(B) Tool tolerances taken into consideration			X	
	(ii) Immediate repairs for:			X	
	(A) Dents meeting 309(b) criteria				
(B) Defects meeting immediate criteria in §192.933(d)			X		
(C) Calculated failure pressure ratio less than 1.25 for .67 design factor			X		
(D) Calculated failure pressure ratio less than 1.4 for .56 design factor			X		
(iii) Repairs within 1 year for:			X		
(A) Defects meeting 1 year criteria in 933(d)					
(B) Calculated failure pressure ratio less than 1.25 for .80 design factor			X		
(C) Calculated failure pressure ratio less than 1.50 for .67 design factor			X		
(D) Calculated failure pressure ratio less than 1.80 for .56 design factor			X		
(iv) Evaluate defect growth rate for anomalies with > 1 year repair interval and set repair interval			X		
(1) Provide overpressure protection to a max of 104% MAOP			X		

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192.620	Alternative MAOP Procedures and Verifications	S	U	N/A	N/C
.620(e)				X	
	(2) Procedure for establishing and maintaining set points for SCADA			X	
				X	
				X	
				X	

**Comments:**

Not using the alternative maop procedures.

Leave this list with the operator.

### Recent PHMSA Advisory Bulletins (Last 2 years)

<b><u>Number</u></b>	<b><u>Date</u></b>	<b><u>Subject</u></b>
ADB-07-02	February 29, 2008	Correction - Pipeline Safety: Updated Notification of the Susceptibility to Premature Brittle-Like Cracking of Older Plastic Pipe
ADB-08-01	May 13, 2008	Pipeline Safety - Notice to Operators of Gas Transmission Pipelines on the Regulatory Status of Direct Sales Pipelines
ADB-08-02	March 4, 2008	Pipeline Safety - Issues Related to Mechanical Couplings Used in Natural Gas Distribution Systems
ADB-08-03	March 10, 2008	Pipeline Safety - Dangers of Abnormal Snow and Ice Build-Up on Gas Distribution Systems
ADB-08-04	June 5, 2008	Pipeline Safety - Installation of Excess Flow Valves into Gas Service Lines
ADB-08-05	June 25, 2008	Pipeline Safety - Notice to Hazardous Liquid Pipeline Operators of Request for Voluntary Adv Notification of Intent To Transport Biofuels
ADB-08-06	July 2, 2008	Pipeline Safety - Dynamic Riser Inspection, Maintenance, and Monitoring Records on Offshore Floating Facilities
ADB-09-01	May 21, 2009	Potential Low and Variable Yield and Tensile Strength and Chemical Composition Properties in High Strength Line Pipe
ADB-09-02	Sept 30, 2009	Weldable Compression Coupling Installation
ADB-09-03	Dec 7, 2009	Operator Qualification Program Modifications
ADB-09-04	Jan 14, 2010	Reporting Drug and Alcohol Test Results for Contractors and Multiple Operator Identification Numbers
ADB-10-01	Jan 26, 2010	Pipeline Safety: Leak Detection on Hazardous Liquid Pipelines
ADB-10-02	Feb 3, 2010	Implementation of Revised Incident/Accident Report Forms for Distribution Systems, Gas Transmission and Gathering Systems, and Hazardous Liquid Systems
ADB-10-03	March 24, 2010	Girth Weld Quality Issues Due to Improper Transitioning, Misalignment, and Welding Practices of Large Diameter Line Pipe

For more PHMSA Advisory Bulletins, go to <http://ops.dot.gov/regs/advise.htm>