

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Transmission Pipelines
Records Review and Field Inspection (Form D)

A completed **Standard Inspection Checklist, Cover Letter and Field Report** is to be submitted to the Senior Engineer within 30 days from completion of the inspection.

Inspection Report			
Docket Number	100017		
Inspector Name & Submit Date	Lex Vinsel (lead), Kuang Chu (team)/Submit 4/30/2010		
Sr. Eng Name & Review Date	5/5/2010		
Operator Information			
Name of Operator:	Cardinal Pacific FG	OP ID #:	32176
Name of Unit(s):	Cardinal FG		
Records Location:	Winlock WA		
Date(s) of Last (unit) Inspection:	November 5-7, 2007	Inspection Date(s):	March 29 – 31, 2010

Inspection Summary:

Cardinal FG is located at 545 Avery Road West in Winlock WA. The Company operates approximately 3.25 miles of six inch natural gas transmission pipeline in Lewis County WA beginning at the Williams Northwest Pipeline Interconnection at the Williams Chehalis Compressor Station and ending at the Cardinal Glass Facility. This pipeline is commonly known as the Cardinal Pipeline.

We conducted a natural gas inspection from March 29-31, 2010 of Cardinal FG. The inspection included Operations and Maintenance Manual review, a records review, OQ inspections of field personnel and a field inspection of the pipeline facilities.

During the records review portion of the inspection it was found that the Operators Public Awareness Program did not meet Items #97-99 of this checklist. The letter to Landowners (Public) does NOT cover all requirements of 192.616(d) (1-5).

HQ Address: Cardinal Glass 545 Avery Road West Winlock WA 98596	System/Unit Name & Address:	
Co. Official: Steve Smith Phone No.: (360) 242-4289 Fax No.: (360) 266-0047 Emergency Phone No.: (360) 262-3998	Phone No.: Fax No.: Emergency Phone No.:	
Persons Interviewed	Title	Phone No.
Bob Cosentino	Principal Consultant, CCI	530.690.1442
Chuck Miller	Mechanical Engineer	360.242.4296

UTC staff conducted abbreviated procedures inspection on 192 O&M and WAC items that changed since the last inspection. This checklist focuses on Records and Field items per a routine standard inspection.

(check one below and enter appropriate date)

<input type="checkbox"/>	Team inspection was performed (Within the past five years.) or,	Date:	
<input checked="" type="checkbox"/>	Other UTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.)	Date:	03-31-2010

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GAS SYSTEM OPERATIONS			
Gas Supplier	Williams		
Number of reportable safety related conditions last year	0	Number of deferred leaks in system	0
Number of <u>non-reportable</u> safety related conditions last year	0	Number of third party hits last year	0
Miles of transmission pipeline within unit (total miles and miles in class 3 & 4 areas)	3.5 miles as class 3, 0 miles in class 4		
Operating Pressure(s):		MAOP (Within last year)	Actual Operating Pressure (At time of Inspection)
Feeder:			
Town:			
Other:	250	1000	245-250 psig
Does the operator have any transmission pipelines?	Just this one		
Compressor stations? Use Attachment 4.	Cardinal has NO compressors.		

Pipe Specifications:			
Year Installed (Range)	2006	Pipe Diameters (Range)	6 inch
Material Type	Steel	Line Pipe Specification Used	API 5L X-52 ERW steel pipe
Mileage	3.5 miles	SMYS %	22.8%
Supply Company	CSI	Class Locations	1&2

Operator Qualification Field Validation
Important: Per PHMSA, the OQ Field Inspection Protocol Form (Rev 3, Feb 08) shall be used by the inspector as part of this standard inspection. When completed, the inspector will upload this information into the PHMSA OQ Database (OQDB) located at http://primis.phmsa.dot.gov/oqdb/home.oq Date Completed: April 29, 2010

Integrity Management Field Validation
Important: Per PHMSA, IMP Field Verification Form (Rev 3, March 09) shall be used by the inspector as part of this standard inspection. When completed, the inspector will upload this information into the PHMSA IM Database (IMDB) located at http://primis.phmsa.dot.gov/gasimp/home.gim Date Completed: N/A, NO HCA, NO IMP.

REPORTING RECORDS			S	U	N/A	N/C
1.	49 U.S.C. 60132, Subsection (b)	Submission of Data to the National Pipeline Mapping System Under the Pipeline Safety Improvement Act of 2002 Updates to NMPS: Operators are required to make update submissions every 12 months if any system modifications have occurred. <u>If no modifications have occurred since the last complete submission (including operator contact information), send an email to opsgis@rspa.dot.gov stating that fact.</u> Include operator contact information with all updates.	X			
2.	RCW 81.88.080	Pipeline Mapping System: Has the operator provided accurate maps (or updates) of pipelines, operating over two hundred fifty pounds per square inch gauge, to specifications developed by the commission sufficient to meet the needs of first responders?			X	
3.	191.5	Telephonic reports to National Response Center (800-424-8802) none	X			
4.	191.15	Written incident reports; supplemental incident reports (DOT Form RSPA F 7100.2) none	X			
5.	191.17 (a)	Annual Report (DOT Form RSPA F 7100.2-1)	X			
6.	191.23	Safety related condition reports none	X			

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REPORTING RECORDS			S	U	N/A	N/C
7.	192.727(g)	Abandoned facilities offshore, onshore crossing commercially navigable waterways reports none	X			
8.	480-93-200(1)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9146 (Within 2 hours) for events which (regardless of cause); none	X			
9.	480-93-200(1)(a)	Result in a fatality or personal injury requiring hospitalization; none	X			
10.	480-93-200(1)(b)	Results in damage to property of the operator and others of a combined total exceeding fifty thousand dollars; none Note: Report all damages regardless if claim was filed with pipeline company or not.	X			
11.	480-93-200(1)(c)	Results in the evacuation of a building, or high occupancy structures or areas; none	X			
12.	480-93-200(1)(d)	Results in the unintentional ignition of gas; none	X			
13.	480-93-200(1)(e)	Results in the unscheduled interruption of service furnished by any operator to twenty five or more distribution customers; none	X			
14.	480-93-200(1)(f)	Results in a pipeline or system pressure exceeding the MAOP plus ten percent or the maximum pressure allowed by proximity considerations outlined in WAC 480-93-020; none	X			
15.	480-93-200(1)(g)	Is significant, in the judgment of the operator, even though it does not meet the criteria of (a) through (e) of this subsection; or none	X			
16.	480-93-200(2)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9146 (Within 24 hours) for; none	X			
17.	480-93-200(2)(a)	The uncontrolled release of gas for more than two hours; none	X			
18.	480-93-200(2)(b)	The taking of a high pressure supply or transmission pipeline or a major distribution supply pipeline out of service; None	X			
19.	480-93-200(2)(c)	A pipeline operating at low pressure dropping below the safe operating conditions of attached appliances and gas equipment; or none	X			
20.	480-93-200(2)(d)	A pipeline pressure exceeding the MAOP none	X			
21.	480-93-200(5)	Written incident reports (within 30 days) including the following; none	X			
22.	480-93-200(4)(a)	Name(s) and address(es) of any person or persons injured or killed, or whose property was damaged; none	X			
23.	480-93-200(4)(b)	The extent of injuries and damage; none	X			
24.	480-93-200(4)(c)	A description of the incident or hazardous condition including the date, time, and place, and reason why the incident occurred. If more than one reportable condition arises from a single incident, each must be included in the report; none	X			
25.	480-93-200(4)(d)	A description of the gas pipeline involved in the incident or hazardous condition, the system operating pressure at that time, and the MAOP of the facilities involved; none	X			
26.	480-93-200(4)(e)	The date and time the gas pipeline company was first notified of the incident; none	X			
27.	480-93-200(4)(f)	The date and time the ((operators')) gas pipeline company's first responders arrived on-site; none	X			
28.	480-93-200(4)(g)	The date and time the gas ((facility)) pipeline was made safe; none	X			
29.	480-93-200(4)(h)	The date, time, and type of any temporary or permanent repair that was made; none	X			
30.	480-93-200(4)(i)	The cost of the incident to the ((operator)) gas pipeline company; none	X			
31.	480-93-200(4)(j)	Line type; none	X			
32.	480-93-200(4)(k)	City and county of incident; and none	X			
33.	480-93-200(4)(l)	Any other information deemed necessary by the commission; none	X			
34.	480-93-200(5)	Submit a supplemental report if required information becomes available	X			
35.	480-93-200(6)	Written report within 45 days of receiving the failure analysis of any incident or hazardous condition due to construction defects or material failure none	X			
36.	480-93-200(7)	Annual Reports filed with the commission no later than March 15 for the proceeding calendar year	X			
37.	480-93-200(7)(a)	A copy of PHMSA F-7100.1-1 and F-7100.2-1 annual report required by U.S. Department of Transportation, PHMSA/Office of Pipeline Safety	X			
38.	480-93-200(7)(b)	Damage Prevention Statistics Report including the following;	X			
39.	480-93-200(7)(b)(i)	Number of gas-related one-call locate requests completed in the field;	X			

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40.	480-93-200(7)(b)(ii)	Number of third-party damages incurred: and none	X			
41.	480-93-200(7)(b)(iii)	Cause of damage, where cause of damage is classified as one of the following: (A) Inaccurate locate; (B) Failure to use reasonable care; (C) Excavated prior to a locate being conducted; or (D) Excavator failed to call for a locate. none	X			
42.	480-93-200(7)(c)	Reports detailing all construction defects and material failures resulting in leakage. Categorizing the different types of construction defects and material failures. The report must include the following: (i) Types and numbers of construction defects; and (ii) Types and numbers of material failures. none	X			
43.	480-93-200(8)	Providing updated emergency contact information to the commission and appropriate officials of all municipalities where gas pipeline companies have facilities No change	X			
44.	480-93-200(9)	Providing by email, reports of daily construction and repair activities no later than 10:00 a.m. none	X			
45.	480-93-200(10)	Submitting copy of DOT Drug and Alcohol Testing MIS Data Collection Form when required none	X			

Comments:

Item #2 – Cardinal pipeline does NOT operate above 250 psig.

CONSTRUCTION RECORDS			S	U	N/A	N/C
46.	192.225	Test Results to Qualify Welding Procedures			X	
47.	192.227	Welder Qualification			X	
48.	192.241(a)	Visual Weld Inspector Training/Experience			X	
49.	192.243(b)(2)	Nondestructive Technician Qualification			X	
50.	192.243(c)	NDT procedures			X	
51.	192.243(f)	Total Number of Girth Welds			X	
52.	192.243(f)	Number of Welds Inspected by NDT			X	
53.	192.243(f)	Number of Welds Rejected			X	
54.	192.243(f)	Disposition of each Weld Rejected			X	
55.	480-93-080(1)(b)	Use of testing equipment to record and document essential variables			X	
56.	480-93-115(2)	Test leads on casings (without vents) installed after 9/05/1992			X	
57.	480-93-115(3)	Sealing ends of casings or conduits on Transmission lines and main			X	
58.	480-93-115(4)	Sealing ends (nearest building wall) of casings or conduits on services			X	
59.	192.303	Construction Specifications			X	
60.	192.325	Underground Clearance			X	
61.	192.327	Amount, Location, Cover of each Size of Pipe Installed			X	
62.	192.328	If the pipeline will be operated at the alternative MAOP standard calculated under 192.620 (80% SMYS) does it meet the additional construction requirements for: <ul style="list-style-type: none"> • Quality assurance • Girth welds • Depth of cover • Initial strength testing, and; • Interference currents? 			X	

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CONSTRUCTION RECORDS			S	U	N/A	N/C
63.	480-93-160(1)	Detailed report filed 45 days prior to construction or replacement of transmission pipelines ≥ 100 feet in length			X	
64.	480-93-170(3)	Pressure Tests Performed on new and replacement pipelines			X	
65.	480-93-170(10)	Pressure Testing Equipment checked for Accuracy/Intervals (Manufacturers Recom or Operators schedule)			X	
66.	480-93-175(1)	Study prepared and approved prior to moving and lowering of metallic pipelines > 60 psig none			X	
67.	192.455	Cathodic Protection None			X	

Comments:

Items #46-67 – Cardinal had NO construction during this time period.

OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
68.	192.14	Conversion To Service Performance and Records No conversion to service				
69.	192.14 (a)(2)	Visual inspection of right of way, aboveground and selected underground segments			X	
70.	192.14 (a)(3)	Correction of unsafe defects and conditions none			X	
71.	192.14 (a)(4)	Pipeline testing in accordance with Subpart J none			X	
72.	192.14 (b)	Pipeline records: investigations, tests, repairs, replacements, alterations (life of pipeline)			X	
73.	192.16	Customer Notification (Verification – 90 days – and Elements) none			X	
74.	192.603(b)	Procedural Manual Review – Operations and Maintenance (1 per yr/15 months) .605(a)	X			
75.	192.603(b)	Abnormal Operations .605(c) none	X			
76.	192.603(b)	Availability of construction records, maps, operating history to operating personnel .605(b)(3)	X			
77.	192.603(b)	Periodic review of personnel work – effectiveness of normal O&M procedures .605(b)(8)	X			
78.	192.603(b)	Periodic review of personnel work – effectiveness of abnormal operation procedures .605(c)(4)	X			
79.		Damage Prevention Program	X			
80.	192.603(b)	List of Current Excavators .614 (c)(1) Cardinal uses the local 'UULC' breakfast as contact.	X			
81.	192.603(b)	Notification of Public/Excavators .614 (c)(2)	X			
82.	192.603(b)	Notifications of planned excavations. (One -Call Records) .614 (c)(3)	X			
83.		Damage Prevention (Operator Internal Performance Measures)				
84.		Does the operator have a quality assurance program in place for monitoring the locating and marking of facilities? Not in writing, but every year for the Cardinal statistics report, Bob reviews every locate ticket and would not if there was a call back or mis-locate. There have been NO such problems to date. Do operators conduct regular field audits of the performance of locators/contractors and take action when necessary? (CGA Best Practices v. 6.0. Best Practice 4-18. Recommended only. not required) Cardinal will observe locators when possible.	X			
85.		Does operator including performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties? No incentives or penalties in contract, however with only 1 contract employee if there was a mis-locate then the contract employee would be retrained.	X			
86.		Do locate contractors address performance problems for persons performing locating services through mechanisms such as re-training, process change, or changes in staffing levels? Yes, both NW Fab and Cardinal address performance problems.	X			

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OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C												
87.		Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates? NW Fab uses Neccer for all OQ including locating. NW Fab OQ has not changed. After Weyerhaeuser 2005 inspection, Jack Dent did and independent 3rd party review of NW FAB OQ plan.	X															
88.		Review operator locating and excavation <u>procedures</u> for compliance with state law and regulations. This is reviewed during O&M review. O&M Section H, Procedure P1.	X															
89.		Are locates are being made within the timeframes required by state law and regulations? Examine record sample. Yes, reviewed 7 locates, Cardinal completed all within the required time frame.	X															
90.		Are locating and excavating personnel properly <u>qualified</u> in accordance with the operator's Operator Qualification plan and with federal and state requirements? In 2005 Jack Dent did an independent 3rd party review of NW FAB OQ. The OQ plan has not changed since that time.	X															
91.	192.709	Class Location Study (If Applicable) .609 none	X															
92.	192.603(b)	Prompt and effective response to each type of emergency .615(a)(3) Note: Review operator records of previous accidents and failures including third-party damage and leak response None	X															
93.	192.603(b)	Location Specific Emergency Plan .615(b)(1)	X															
94.	192.603(b)	Emergency Procedure training, verify effectiveness of training .615(b)(2)	X															
95.	192.603(b)	Employee Emergency activity review, determine if procedures were followed. .615(b)(3)	X															
96.	192.603(b)	Liaison Program with Public Officials .615(c) Form F-30	X															
192.605(a)	Public Awareness Program .616																	
	Operators in existence on June 20, 2005, must have completed their written programs no later than June 20, 2006. See 192.616(a) and (j) for exceptions.																	
	API RP 1162 Baseline* Recommended Message Deliveries																	
	<table border="1" style="width: 100%;"> <thead> <tr> <th style="text-align: center;">Stakeholder Audience (Natural Gas Transmission Line Operators)</th> <th style="text-align: center;">Baseline Message Frequency (starting from effective date of Plan)</th> </tr> </thead> <tbody> <tr> <td>Residents Along Right-of-Way and Places of Congregation</td> <td>2 years</td> </tr> <tr> <td>Emergency Officials</td> <td>Annual</td> </tr> <tr> <td>Public Officials</td> <td>3 years</td> </tr> <tr> <td>Excavator and Contractors</td> <td>Annual</td> </tr> <tr> <td>One-Call Centers</td> <td>As required of One-Call Center</td> </tr> </tbody> </table>		Stakeholder Audience (Natural Gas Transmission Line Operators)	Baseline Message Frequency (starting from effective date of Plan)	Residents Along Right-of-Way and Places of Congregation	2 years	Emergency Officials	Annual	Public Officials	3 years	Excavator and Contractors	Annual	One-Call Centers	As required of One-Call Center				
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* Refer to API RP 1162 for additional requirements, including general program recommendations, supplemental requirements, recordkeeping, program evaluation, etc.																		
97.	192.605(a)	The operator's program must specifically include provisions to educate the public, appropriate government organizations, and persons engaged in excavation related activities on: .616(d) (1) Use of a one-call notification system prior to excavation and other damage prevention activities; (2) Possible hazards associated with the unintended release from a gas pipeline facility (3) Physical indications of a possible release; (4) Steps to be taken for public safety on the event of a gas pipeline release; and (5) Procedures to report such an event (to the operator).		X														
98.		The operator's program must include activities to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations. .616(e)	X															
99.		The operators program and the media used must be comprehensive enough to reach all areas in which the operator transports gas. .616(f)	X															
100.		The program conducted in English and any other languages commonly understood by a significant number of the population in the operator's area. .616(g)	X															

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101.		Analyzing accidents and failures including laboratory analysis where appropriate to determine cause and prevention of recurrence .617 Note: Including excavation damage (PHMSA area of emphasis)	X															
102.	192.517	Pressure Testing none	X															
103.	.553(b)	Upgrading none	X															
104.	192.709	Maximum Allowable Operating Pressure (MAOP)																
105.		Note: If the operator is operating at 80% SMYS with waivers, the inspector needs to review the special conditions of the waiver.																
106.	.605(a)	MAOP cannot exceed the lowest of the following: .619																
107.		Design pressure of the weakest element, .619(a)(1) Amdt, 192-103 pub. 06/09/06, eff. 07/10/06	X															
108.		The highest actual operating pressure to which the segment of line was subjected during the 5 years preceding the applicable date in the second column, unless the segment was tested in accordance to .619(a)(2) after the applicable date in the third column or the segment was upgraded according to subpart K. Amdt 192-102 pub. 3/15/06, eff. 04/14/06. For gathering line related compliance deadlines and additional gathering line requirements, refer to Part 192 including this amendment. .619(a)(3)	X															
		<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%;">Pipeline segment</th> <th style="width: 25%;">Pressure date</th> <th style="width: 25%;">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>March 15, 2006, or date line becomes subject to this part, whichever is later.</td> <td>5 years preceding applicable date in second column.</td> </tr> <tr> <td>Offshore gathering lines</td> <td>July 1, 1976</td> <td>July 1, 1971</td> </tr> <tr> <td>All other pipelines</td> <td>July 1, 1970</td> <td>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.	Offshore gathering lines	July 1, 1976	July 1, 1971	All other pipelines	July 1, 1970	July 1, 1965				
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109.	.605(a)	.619(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. For gathering line related compliance deadlines and additional gathering line requirements, refer to Part 192 including this amendment. Cardinal pipeline was NOT operating prior to 2006.			X													
110.		.620 If the pipeline is designed to the alternative MAOP standard in 192.620 does it meet the additional design requirements for: <ul style="list-style-type: none"> • General standards • Fracture control • Plate and seam quality • Mill hydrostatic testing • Coating • Fittings and flanges • Compressor stations Final rule pub. 10/17/08, eff. 12/22/08 does not apply 			X													
111.	480-93-015(1)	Odorization of Gas – Concentrations adequate	X															
112.	480-93-015(2)	Monthly Odorant Sniff Testing	X															
113.	480-93-015(3)	Prompt action taken to investigate and remediate odorant concentrations not meeting the minimum requirements None			X													
114.	480-93-015(4)	Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation)	X															
115.	480-93-124(3)	Pipeline markers attached to bridges or other spans inspected? 1/yr(15 months)			X													
116.	480-93-124(4)	Markers reported missing or damaged replaced within 45 days?	X															
117.	480-93-185(1)	Reported gas leaks investigated promptly/graded/record retained	X															
118.	480-93-185(3)	Leaks originating from a foreign source reported promptly/notification by mail/record retained	X															
119.	480-93-187	Gas Leak records	X															
120.	480-93-188(1)	Gas Leak surveys Leak surveys are performed 4 times per year. Exceeds requirement	X															

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121.	480-93-188(2)	Gas detection instruments tested for accuracy/intervals (Mfct rec or monthly not to exceed 45 days)	X															
122.	480-93-188(3)	Leak survey frequency (Refer to Table Below)	X															
<table border="1"> <tr> <td>Business Districts (By 6/02/07)</td> <td>1/yr (15 months)</td> </tr> <tr> <td>High Occupancy Structures</td> <td>1/yr (15 months)</td> </tr> <tr> <td>Pipelines Operating ≥ 250 psig</td> <td>1/yr (15 months)</td> </tr> <tr> <td>Other Mains: CI, WI, copper, unprotected steel</td> <td>2/yr (7.5 months)</td> </tr> </table>							Business Districts (By 6/02/07)	1/yr (15 months)	High Occupancy Structures	1/yr (15 months)	Pipelines Operating ≥ 250 psig	1/yr (15 months)	Other Mains: CI, WI, copper, unprotected steel	2/yr (7.5 months)				
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Other Mains: CI, WI, copper, unprotected steel	2/yr (7.5 months)																	
123.	480-93-188(4)(a)	Special leak surveys - Prior to paving or resurfacing, following street alterations or repairs None	X															
124.	480-93-188(4)(b)	Special leak surveys - areas where substructure construction occurs adjacent to underground gas facilities, and damage could have occurred none	X															
125.	480-93-188(4)(c)	Special leak surveys - Unstable soil areas where active gas lines could be affected none	X															
126.	480-93-188(4)(d)	Special leak surveys - areas and at times of unusual activity, such as earthquake, floods, and explosions	X															
127.	480-93-188(5)	Gas Survey Records	X															
128.	480-93-188(6)	Leak Survey Program/Self Audits	X															
129.	192.709	Patrolling (Refer to Table Below) .705	X															
<table border="1"> <tr> <th>Class Location</th> <th>At Highway and Railroad Crossings</th> <th>At All Other Places</th> </tr> <tr> <td>1 and 2</td> <td>2/yr (7½ months)</td> <td>1/yr (15 months)</td> </tr> <tr> <td>3</td> <td>4/yr (4½ months)</td> <td>2/yr (7½ months)</td> </tr> <tr> <td>4</td> <td>4/yr (4½ months)</td> <td>4/yr (4½ months)</td> </tr> </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)																
130.	192.709	Leak Surveys (Refer to Table Below) .706	X															
<table border="1"> <tr> <th>Class Location</th> <th>Required</th> <th>Not Exceed</th> </tr> <tr> <td>1 and 2</td> <td>1/yr</td> <td>15 months</td> </tr> <tr> <td>3</td> <td>2/yr</td> <td>7½ months</td> </tr> <tr> <td>4</td> <td>4/yr</td> <td>4½ months</td> </tr> </table>							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																
131.	192.605(b)	Abandoned Pipelines; Underwater Facility Reports .727(g) none			X													
132.	192.709	Compressor Station Relief Devices (1 per yr/15 months) .731(a) none			X													
133.	192.709	Compressor Station Emergency Shutdown (1 per yr/15 months) .731(c) none			X													
134.	192.709	Compressor Stations – Detection and Alarms (Performance Test) .736(c) none			X													
135.	192.709	Pressure Limiting and Regulating Stations (1 per yr/15 months) .739 2008, 2009	X															
136.	192.709	Pressure Limiting and Regulator Stations – Capacity (1 per yr/15 months) .743 No change.	X															
137.	192.709	Valve Maintenance (1 per yr/15 months) .745	X															
138.	192.709	Vault Maintenance (≥200 cubic feet)(1 per yr/15 months) .749 None	X															
139.	192.603(b)	Prevention of Accidental Ignition (hot work permits) .751 None	X															
140.	192.603(b)	Welding – Procedure .225(b) None	X															
141.	192.603(b)	Welding – Welder Qualification .227/.229 None	X															
142.	192.603(b)	NDT – NDT Personnel Qualification .243(b)(2) None	X															
143.	192.709	NDT Records (Pipeline Life) .243(f) None	X															
144.	192.709	Repair: pipe (Pipeline Life); Other than pipe (5 years) none	X															

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OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
145.	192.905(c)	Periodically examining their transmission line routes for the appearance of newly identified area's (HCA's)	X			

Comments:

Items #84-90 – No locating performed by Cardinal.
 Items #97-99 – Unsatisfactory – Public information is not adequately covered on letter to Landowners. Does NOT cover all requirements of 192.616(d)(1-5)
 Item #109 – Cardinals pipeline did NOT operate prior to 2006.
 Item #110 – Does not apply to Cardinal
 Item #113 – No instances of inadequate odorant.
 Item #115 – Cardinal pipeline does NOT include any bridges or spans.
 Items #131-134 – Cardinal has NO abandoned pipelines NOR any compressors

CORROSION CONTROL RECORDS			S	U	N/A	N/C
146.	192.453	CP procedures (system design, installation, operation, and maintenance) must be carried out by qualified personnel	X			
147.	192.455(a)(2)	CP system installed on and operating within 1 yr of completion of pipeline construction (after 7/31/71)	X			
148.	192.491	Annual Pipe-to-soil Monitoring (1 per yr/15 months) for short sections (10% per year; all in 10 years) .465(a) NO short sections	X			
149.	192.491	Maps or Records .491(a)	X			
150.	192.491	Examination of Buried Pipe when Exposed .459	X			
151.	480-93-110(8)	CP test reading on all exposed facilities where coating has been removed	X			
152.	192.491	Rectifier Monitoring (6 per yr/2½ months) .465(b)			X	
153.	192.491	Interference Bond Monitoring – Critical (6 per yr/2½ months) .465(c)			X	
154.	192.491	Interference Bond Monitoring – Non-critical (1 per yr/15 months) .465(c)			X	
155.	192.491	Prompt Remedial Actions .465(d)			X	
156.	192.491	Unprotected Pipeline Surveys, CP active corrosion areas (1 per 3 cal yr/39 months) .465(e)			X	
157.	192.491	Electrical Isolation (Including Casings) .467	X			
158.	480-93-110(2)	Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) .465(d)			X	
159.	480-93-110(3)	CP Test Equipment and Instruments checked for Accuracy/Intervals (Mfct Rec or Opr Sched)	X			
160.	480-93-110(5)	Casings inspected/tested annually not to exceed fifteen months does not apply, no casings			X	
161.	480-93-110(5)(a)	Casings w/no test leads installed prior to 9/05/1992. Demonstrate other acceptable test methods does not apply, no casings			X	
162.	480-93-110(5)(b)	Possible shorted conditions – Perform confirmatory follow-up inspection within 90 days does not apply, no casings			X	
163.	480-93-110(5)(c)	Casing shorts cleared when practical does not apply, no casings			X	
164.	480-93-110(5)(d)	Shorted conditions leak surveyed within 90 days of discovery. Twice annually/7.5 months does not apply, no casings			X	
165.	192.491	Interference Currents .473 None	X			

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CORROSION CONTROL RECORDS			S	U	N/A	N/C
166.	192.491	Internal Corrosion; Corrosive Gas Investigation .475(a)			X	
167.	192.491	Internal Corrosion; Internal Surface Inspection; Pipe Replacement .475(b)			X	
168.	192.491	Internal Corrosion; New system design; Evaluation of impact of configuration changes to existing systems .476(d)			X	
169.	192.491	Internal Corrosion Control Coupon Monitoring (2 per yr/7½ months) .477			X	
170.	192.491	Atmospheric Corrosion Control Monitoring (1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore) .481 Sept. 2007	X			
171.	192.491	Remedial: Replaced or Repaired Pipe; coated and protected; corrosion evaluation and actions .483/485 does not apply. no piping replaced			X	

Comments:
Item #148 – Cardinal has NO short sections.
Item #152 - No rectifiers on system. Cardinal CP system is galvanic.
Items #153-154 – No bonds on system.
Item #155 – No remedial action required.
Item #156 – No unprotected pipeline.
Item #158 – No remedial action required to date.
Items #160-164 – No casings on Cardinal pipeline.
Items #166-168 – Cardinal only transports NON-corrosive gas.
Item #169 – No Coupons
Item #171 – No piping replaced.

PIPELINE INSPECTION (Field)			S	U	N/A	N/C
172.	192.161	Supports and anchors	X			
173.	192.179	Valve Protection from Tampering or Damage	X			
174.	480-93-015(1)	Odorization levels	X			
175.	192.463	Levels of Cathodic Protection	X			
176.	192.465	Rectifiers does not apply. no rectifiers			X	
177.	192.467	CP - Electrical Isolation	X			
178.	192.469	Test Stations (Sufficient Number)	X			
179.	192.479	Pipeline Components Exposed to the Atmosphere	X			
180.	192.481	Atmospheric Corrosion - monitoring	X			
181.	480-93-115(2)	Casings – Test Leads (Casings w/o vents installed after 9/05/1992) does not apply, no casings			X	
182.	192.605	Knowledge of Operating Personnel	X			
183.	613(b), .703	Pipeline condition, unsatisfactory conditions, hazards, etc.	X			
184.	480-93-124	Pipeline Markers	X			
185.	192.719	Pre-pressure Tested Pipe (Markings and Inventory)				X
186.	192.739	Pressure Limiting and Regulating Devices (Mechanical)	X			
187.	192.743	Pressure Limiting and Regulating Devices (Capacities)	X			
188.	192.751	Warning Signs	X			
189.	192.801 - 192.809	Operator qualification questions – Refer to OQ Field Inspection Protocol Form (Rev 3, Feb 08)	X			

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Comments:

Item #176 – Cardinal has NO rectifiers.

Item #180 – No casings

Item #185 – Pressure tested pipe is on site at Cardinal, staff did not check the pipe. (Large plant, remote location.)

Recent Gas Pipeline Safety Advisory Bulletins: (Last 2 years)

<u>Number</u>	<u>Date</u>	<u>Subject</u>
ADB-07-01	April 27, 2007	Pipeline Safety: Senior Executive Signature and Certification of Integrity Management Program Performance Reports
ADB-07-02	September 6, 2007	Pipeline Safety: Updated Notification of the Susceptibility to Premature Brittle-Like Cracking of Older Plastic Pipe
ADB-07-02	February 29, 2008	Correction - Pipeline Safety: Updated Notification of the Susceptibility to Premature Brittle-Like Cracking of Older Plastic Pipe
ADB-08-02	February 28, 2008	Identifying Issues with Mechanical Couplings that Could Lead to Failure
ADB-08-03	March 10, 2008	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

Comments: