

Inspection Output (IOR)

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Inspection Information

Inspection Name	J.R. Simplot Records Review and Field Verification	Operator(s)	J.R. SIMPLOT COMPANY (32395)	Plan Submitted	01/03/2020
Status	PLANNED	Lead	David Cullom	Plan Approval	01/08/2020 by Joe Subsits
Start Year	2020	Team Members	Darren Tinnerstet	All Activity Start	04/14/2020
System Type	GT	Observer(s)	Scott Rukke, Dennis Ritter, Lex Vinsel, Anthony Dorrough, Deborah Becker, Derek Norwood, Scott Anderson, Rell Koizumi	All Activity End	04/17/2020
Protocol Set ID	GT.2020.01	Supervisor	Joe Subsits	Inspection Submitted	--
		Director	Sean Mayo	Inspection Approval	--

Inspection Summary

****No areas of concern or probable violations noted****

J.R. Simplot potato processing facility located in Moses Lake includes a bio gas digester, non-jurisdictional compressor, and 8-inch diameter high density polyethylene (HDPE) bio gas transmission pipeline in Grant County with a length of 1.4 miles. The pipeline is a Class 1 Location per the 2017-2019 Annual Reports. The pipeline was subjected to a hydrostatic test pressure of 90 PSIG for 3 hours and operates at 15 psig MAOP per the manual, but original pressure test records indicated it was tested for 4 hours. There is no direct relief or worker/monitor system for overpressure protection. The compressor pump curve was reviewed and it demonstrates that over pressurization cannot occur given the current configuration. The valve record annual testing question was not included in the original plan but valve records were reviewed. Valve operation was performed by Matt in October 2019 for valves 1 & 2. I also reviewed 10/2/2018 records where Matt operated both valves. Hector, in 2017, operated valves 1 & 2 on 5/9/2017 and 11/6/2017.

Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	86257	JR Simplot	unit	86257	Compressor Stations Storage Fields Bottle/Pipe - Holders Service Line Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric AMAOP CDA Abandoned	77	77	77	100.0%

1. Percent completion excludes unanswered questions planned as "always observe".

Plans

Plan #	Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent Notes
1.	86257	Baseline Records (Form 1), Baseline Pipeline Field Inspection (Form 1)	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, P, R, O, S TQ, UNGS, GENERIC		Detail
2.	86257	n/a	TQ.PROT9	P, R, O, S	Detail

Plan Implementations

#	Activity Name	SMAR T Act#	Start Date	End Date	Focus Directive s	Involved Groups/Subgroups	Asset Types	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete
1	JR Simplot Records and Field	--	04/14/2020	04/17/2020	n/a	all planned questions	all assets types		77	77	77	100.0%

1. Since questions may be implemented in multiple activities, but answered only once, questions may be represented more than once in this table.
2. Percent completion excludes unanswered questions planned as "always observe".

Forms

This inspection has no Form data entry.

Results (all values, 77 results)

99 (instead of 77) results are listed due to re-presentation of questions in more than one sub-group.

AR.PTI: Integrity Assessment Via Pressure Test

1. Question Result, ID, References [Sat, AR.PTI.PRESSTESTRESULT.R, 192.517\(a\) \(192.505\(a\), 192.505\(b\), 192.505\(c\), 192.505\(d\), 192.507\(a\), 192.507\(b\), 192.507\(c\), 192.513\(a\), 192.513\(b\), 192.513\(c\), 192.513\(d\), 192.517\(b\), 192.617, 192.619\(a\), 192.919\(e\), 192.921\(a\)\(2\)\)](#)

Question Text *Do the test records validate the pressure test?*

Assets Covered [86257](#)

Result Notes *Pressure test was April 29,2009. TP was 89.75 psig for a 4 hour test. Air test. Line pipe MAOP is set at 33 psig, but the manual says the system MAOP is 15 psig due to compressor limitations.*

AR.RMP: Repair Methods and Practices

2. Question Result, ID, References [NA, AR.RMP.IGNITION.O, 192.751\(a\) \(192.751\(b\), 192.751\(c\)\)](#)

Question Text *Perform observations of selected locations to verify that adequate steps have been taken by the operator to minimize the potential for accidental ignition.*

Assets Covered [86257](#)

Result Notes *No such activity/condition was observed during the inspection.*

3. Question Result, ID, References [NA, AR.RMP.WELDTEST.O, 192.719\(a\) \(192.719\(b\)\)](#)

Question Text *Does the operator properly test replacement pipe and repairs made by welding on transmission lines?*

Assets Covered [86257](#)

Result Notes *No such relevant facilities/equipment existed in the scope of inspection review.*

DC.CO: Construction

4. Question Result, ID, References [Sat, DC.CO.CLEAR.R, 192.325\(a\) \(192.325\(b\), 192.325\(c\)\)](#)

Question Text *Do records indicate pipe is installed with clearances in accordance with 192.325, and (if plastic) installed as to prevent heat damage to the pipe?*

Assets Covered [86257](#)

Result Notes There is adequate clearance from other underground structures. No sources of heat from steam or otherwise near the pipeline.

5. Question Result, ID, [Sat, DC.CO.COVER.R, 192.327\(a\) \(192.327\(b\), 192.327\(c\), 192.327\(d\), 192.327\(e\)\)](#) (also presented in: References [DC.COMM](#))

Question Text *Is onshore piping minimum cover provided as specified in 192.327?*

Assets Covered [86257](#)

Result Notes [3-5 feet of cover.](#)

DC.WELDINS: Construction Weld Inspection

6. Question Result, ID, [NA, DC.WELDINS.WELDVISUALQUAL.R, 192.241 \(192.225, 192.227, 192.229, 192.231, 192.233, 192.243, 192.245\)](#)

Question Text *Does the operator have records showing that the welding was visually and/or non-destructively tested according to the requirements of 192.241 and the operator's specifications or procedures?*

Assets Covered [86257](#)

Result Notes [No such relevant facilities/equipment existed in the scope of inspection review.](#)

7. Question Result, ID, References [NA, DC.WELDINS.WELDNDR.R, 192.243](#)

Question Text *Do records indicate that NDT and interpretation are in accordance with 192.243?*

Assets Covered [86257](#)

Result Notes [No such relevant facilities/equipment existed in the scope of inspection review.](#)

DC.WELDPROCEDURE: Construction Welding Procedures

8. Question Result, ID, References [NA, DC.WELDPROCEDURE.WELD.R, 192.225](#)

Question Text *Does the operator have detailed records showing proper qualification of the welding procedures in accordance with 192.225?*

Assets Covered [86257](#)

Result Notes [No such relevant facilities/equipment existed in the scope of inspection review.](#)

DC.COMM: Pipeline Commissioning

9. Question Result, ID, References [Sat, MO.GO.OMHISTORY.R, 192.605\(a\) \(192.605\(b\)\(3\)\)](#) (also presented in: [MO.GO](#))

Question Text *Are construction records, maps, and operating history available to appropriate operating personnel?*

Assets Covered [86257](#)

Result Notes [Lance has a copy and the operators have a copy at the digester.](#)

10. Question Result, ID, References [Sat, EP.ERG.LIAISON.R, 192.605\(a\) \(192.615\(c\)\(1\), 192.615\(c\)\(2\), 192.615\(c\)\(3\), 192.615\(c\)\(4\), 192.616\(c\), ADB-05-03\)](#) (also presented in: [EP.ERG, PD.PA](#))

Question Text *Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?*

Assets Covered [86257](#)

Result Notes [Simplot hosted LEPC meetings for 12/12/2019, 12/13/2018, and they have monthly meetings. They present once every year. Norco, Nuriyon, and others are listed as attendees.](#)

11. Question Result, ID, References [Sat, DC.CO.COVER.R, 192.327\(a\) \(192.327\(b\), 192.327\(c\), 192.327\(d\), 192.327\(e\)\)](#) (also presented in: [DC.CO](#))

Question Text *Is onshore piping minimum cover provided as specified in 192.327?*

Assets Covered [86257](#)

Result Notes [3-5 feet of cover.](#)

12. Question Result, ID, References [Sat, DC.DPC.VALVESPACE.O, 192.141 \(192.179\(a\), 192.179\(b\), 192.179\(c\), 192.179\(d\)\)](#) (also presented in: [DC.DPC](#))

Question Text *Are transmission line valves being installed as required by 192.179?*

Assets Covered [86257](#)

- Result Notes Valves are installed at both ends of the line. Each point on the pipeline in a Class 2 location is within 7.5 miles (12 kilometers) of a valve. The valve installation meets Class 4 requirements.
13. Question Result, ID, References Sat, MO.GM.VALVEINSPECT.O, 192.745(a) (192.745(b)) (also presented in: MO.GM)
 Question Text *Are field inspection and partial operation of transmission line valves adequate?*
 Assets Covered 86257
 Result Notes Valves 1 and 2 were partially operated during this inspection. No operational issues.
14. Question Result, ID, References NA, MO.GO.CONTSURVEILLANCE.O, 192.613(a) (192.613(b), 192.703(a), 192.703(b), 192.703(c)) (also presented in: MO.GOCLASS, MO.GO)
 Question Text *Are unsatisfactory conditions being captured and addressed by continuing surveillance of facilities and the pipeline as required by 192.613?*
 Assets Covered 86257
 Result Notes No such event occurred, or condition existed, in the scope of inspection review.
15. Question Result, ID, References Sat, MO.RW.ROWMARKER.O, 192.707(a) (192.707(b), 192.707(c), 192.707(d)) (also presented in: MO.RW, PD.RW)
 Question Text *Are line markers placed and maintained as required?*
 Assets Covered 86257
 Result Notes The operator stated they added new stickers to the line markers to replace weathered markings recently. All observed appeared to be readily visible.
16. Question Result, ID, References Sat, MO.RW.ROWCONDITION.O, 192.705(a) (192.705(c)) (also presented in: MO.RW, PD.RW)
 Question Text *Are the ROW conditions acceptable for the type of patrolling used?*
 Assets Covered 86257
 Result Notes The line can be walked or observed from the rural road it runs next to.
17. Question Result, ID, References Sat, PD.DP.PDPROGRAM.R, 192.614(c) (also presented in: PD.DP)
 Question Text *Does the damage prevention program meet minimum requirements specified in 192.614(c)?*
 Assets Covered 86257
 Result Notes Cosentino used to send out a damage prevention fliers. One was sent in Nov 2018. The Compliance Group will be doing this in house for 2020
18. Question Result, ID, References NA, MO.GOODOR.ODORIZE.R, 192.709(c) (192.625(a), 192.625(b), 192.625(c), 192.625(d), 192.625(e), 192.625(f)) (also presented in: MO.GOODOR)
 Question Text *Do records indicate appropriate odorization of its combustible gases in accordance with its processes and conduct of the required testing to verify odorant levels met requirements?*
 Assets Covered 86257
 Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
19. Question Result, ID, References Sat, TQ.TR.TRAINING.R, 192.615(b)(2) (192.807(a), 192.807(b)) (also presented in: TQ.TR)
 Question Text *Is training for emergency response personnel documented?*
 Assets Covered 86257
 Result Notes ERT 2019 training was Nov 14, 2019. Lance, Andy, Hector, Matthew all attended the training. 2018 was reviewed as well and 5 attendees.
20. Question Result, ID, References Sat, TQ.OQ.RECORDS.R, 192.807 (also presented in: TQ.OQ)
 Question Text *Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified?*
 Assets Covered 86257
 Result Notes I reviewed the MEA and EWN records for present and past employees.
21. Question Result, ID, References Sat, TQ.PROT9.TASKPERFORMANCE.O, 192.801(a) (192.809(a)) (also presented in: TQ.PROT9)
 Question Text *Verify the qualified individuals performed the observed covered tasks in accordance with the operator's processes or operator approved contractor processes.*

Assets Covered 86257

Result Notes The operator was able to detail AOCs and used safe work practices when operating the valve.

DC.DPC: Design of Pipe Components

22. Question Result, ID, Sat, DC.DPC.VALVESPACE.O, 192.141 (192.179(a), 192.179(b), 192.179(c), 192.179(d)) (also presented References in: DC.COMM)

Question Text *Are transmission line valves being installed as required by 192.179?*

Assets Covered 86257

Result Notes Valves are installed at both ends of the line. Each point on the pipeline in a Class 2 location is within 7.5 miles (12 kilometers) of a valve. The valve installation meets Class 4 requirements.

23. Question Result, ID, NA, DC.DPC.INTCORRODE.R, 192.476(d) (192.476(b), 192.476(c), 192.476(a)) References

Question Text *Do records demonstrate the transmission line project has features incorporated into its design and construction to reduce the risk of internal corrosion, as required of 192.476?*

Assets Covered 86257

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

24. Question Result, ID, NA, DC.DPC.INTCORRODE.O, 192.476(a) (192.476(b), 192.476(c)) References

Question Text *Does the transmission project's design and construction comply with 192.476?*

Assets Covered 86257

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

DC.MO: Maintenance and Operations

25. Question Result, ID, Sat, DC.MO.MAOPLIMIT.O, 192.605(b)(5) References

Question Text *During startup or shut-in, is it assured that the pressure limitations on the pipeline were not exceeded?*

Assets Covered 86257

Result Notes The operator is cognizant of low operating pressures and the high pressure conditions are limited by the compressor curve.

EP.ERG: Emergency Response

26. Question Result, ID, NA, EP.ERG.POSTEVNTREVIEW.R, 192.605(a) (192.615(b)(1), 192.615(b)(3)) References

Question Text *Do records indicate review of employee activities to determine whether the procedures were effectively followed in each emergency?*

Assets Covered 86257

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

27. Question Result, ID, Sat, EP.ERG.LIAISON.R, 192.605(a) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), References 192.616(c), ADB-05-03) (also presented in: DC.COMM, PD.PA)

Question Text *Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?*

Assets Covered 86257

Result Notes Simplot hosted LEPC meetings for 12/12/2019, 12/13/2018, and they have monthly meetings. They present once every year. Norco, Nuriyon, and others are listed as attendees.

FS.FG: Facilities General

28. Question Result, ID, NA, FS.FG.VAULTINSPECT.R, 192.709(c) (192.749(a), 192.749(b), 192.749(c), 192.749(d)) (also References presented in: MO.GM)

Question Text *Do records document the adequacy of inspections of all vaults having an internal volume ≥ 200 cubic feet (5.66 cubic meters) that house pressure regulating/limiting equipment?*

Assets Covered 86257

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

MO.GC: Conversion to Service

29. Question Result, ID, References NA, MO.GC.CONVERSION.R, 192.14(a) (192.14(b))

Question Text *Do records indicate the process was followed for converting any pipelines into Part 192 service?*

Assets Covered 86257

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

MO.GOABNORMAL: Gas Pipeline Abnormal Operations

30. Question Result, ID, References NA, MO.GOABNORMAL.ABNORMAL.R, 192.605(a) (192.605(c)(1))

Question Text *Did personnel respond to indications of abnormal operations as required by the process?*

Assets Covered 86257

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

31. Question Result, ID, References NA, MO.GOABNORMAL.ABNORMALREVIEW.R, 192.605(a) (192.605(c)(4))

Question Text *Do records indicate periodic review of work done by operator personnel to determine the effectiveness of the abnormal operation processes and corrective action taken where deficiencies are found?*

Assets Covered 86257

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

MO.GOCLASS: Gas Pipeline Class Location

32. Question Result, ID, References Sat, MO.GOCLASS.CLASSLOCATESTUDY.R, 192.605(b)(1) (192.609(a), 192.609(b), 192.609(c), 192.609(d), 192.609(e), 192.609(f))

Question Text *Do records indicate performance of the required study whenever the population along a pipeline increased or there was an indication that the pipe hoop stress was not commensurate with the present class location?*

Assets Covered 86257

Result Notes Form F-17 notes this.

33. Question Result, ID, References NA, MO.GO.CONTSURVEILLANCE.O, 192.613(a) (192.613(b), 192.703(a), 192.703(b), 192.703(c)) (also presented in: DC.COMM, MO.GO)

Question Text *Are unsatisfactory conditions being captured and addressed by continuing surveillance of facilities and the pipeline as required by 192.613?*

Assets Covered 86257

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

MO.GOMAOP: Gas Pipeline MAOP

34. Question Result, ID, References Sat, MO.GOMAOP.MAOPDETERMINE.R, 192.709(c) (192.619(a), 192.619(b))

Question Text *Do records indicate determination of the MAOP of pipeline segments in accordance with 192.619 and limiting of the operating pressure as required?*

Assets Covered 86257

Result Notes This is in the manual. Appendix D

MO.GM: Gas Pipeline Maintenance

35. Question Result, ID, References Sat, MO.GM.RECORDS.R, 192.605(b)(1) (192.243(f), 192.709(a), 192.709(b), 192.709(c)) (also presented in: MO.GMOPP)

Question Text *Do records indicate that records are maintained of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test?*

Assets Covered 86257

Result Notes Patrols are done every year. RRs and roads are done 2x year.

11/6/2017, 5/9/2017 and 1/6/2019

10/2/2018 and 4/12/2018

1/13/2019 (part of a leak survey) 10/7/2019, 6/3/2019

36. Question Result, ID, References NA, MO.GM.IGNITION.R, 192.709 (192.751(a), 192.751(b), 192.751(c))
Question Text *Do records indicate personnel followed processes for minimizing the danger of accidental ignition where the presence of gas constituted a hazard of fire or explosion?*
Assets Covered 86257
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
37. Question Result, ID, References Sat, MO.GM.VALVEINSPECT.O, 192.745(a) (192.745(b)) (also presented in: DC.COMM)
Question Text *Are field inspection and partial operation of transmission line valves adequate?*
Assets Covered 86257
Result Notes Valves 1 and 2 were partially operated during this inspection. No operational issues.
38. Question Result, ID, References NA, FS.FG.VAULTINSPECT.R, 192.709(c) (192.749(a), 192.749(b), 192.749(c), 192.749(d)) (also presented in: FS.FG)
Question Text *Do records document the adequacy of inspections of all vaults having an internal volume of 200 cubic feet (5.66 cubic meters) that house pressure regulating/limiting equipment?*
Assets Covered 86257
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

MO.GOODOR: Gas Pipeline Odorization

39. Question Result, ID, References NA, MO.GOODOR.ODORIZE.R, 192.709(c) (192.625(a), 192.625(b), 192.625(c), 192.625(d), 192.625(e), 192.625(f)) (also presented in: DC.COMM)
Question Text *Do records indicate appropriate odorization of its combustible gases in accordance with its processes and conduct of the required testing to verify odorant levels met requirements?*
Assets Covered 86257
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

MO.GO: Gas Pipeline Operations

40. Question Result, ID, References NA, MO.GO.CONTSURVEILLANCE.O, 192.613(a) (192.613(b), 192.703(a), 192.703(b), 192.703(c)) (also presented in: DC.COMM, MO.GOCLASS)
Question Text *Are unsatisfactory conditions being captured and addressed by continuing surveillance of facilities and the pipeline as required by 192.613?*
Assets Covered 86257
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
41. Question Result, ID, References Sat, MO.GO.OMANNUALREVIEW.R, 192.605(a)
Question Text *Has the operator conducted annual reviews of the written procedures or processes in the manual as required?*
Assets Covered 86257
Result Notes Hard copies were maintained 2016-2018 and TCG has their review in the manual.
42. Question Result, ID, References Sat, MO.GO.OMEFFECTREVIEW.R, 192.605(a) (192.605(b)(8))
Question Text *Do records indicate periodic review of the work done by operator personnel to determine the effectiveness, and adequacy of the processes used in normal operations and maintenance and modifying the processes when deficiencies are found?*
Assets Covered 86257

Result Notes CCI used to take one procedure and go through it. CCI did valves for Hector in 2017. 2016 for Ashley Baum for Patrols. In the future, may have plant supervisors perform a review. The form is F24. They can use the form for SRCs AOCs or normal operations.

43. Question Result, ID, References Sat, MO.GO.OMHISTORY.R, 192.605(a) (192.605(b)(3)) (also presented in: DC.COMM)

Question Text *Are construction records, maps, and operating history available to appropriate operating personnel?*

Assets Covered 86257

Result Notes Lance has a copy and the operators have a copy at the digester.

44. Question Result, ID, References Sat, MO.GO.OMHISTORY.O, 192.605(b)(3)

Question Text *Are construction records, maps and operating history available to appropriate operating personnel?*

Assets Covered 86257

Result Notes Materials needed for safe operation are at the digester and in the main office. These locations are at both ends of the line.

45. Question Result, ID, References NA, MO.GO.UPRATE.R, 192.553(b) (192.553(a), 192.553(c), 192.553(d))

Question Text *Do records indicate the pressure uprating process was implemented per the requirements of 192.553?*

Assets Covered 86257

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

MO.GMOPP: Gas Pipeline Overpressure Protection

46. Question Result, ID, References NA, MO.GMOPP.PRESSREGCAP.R, 192.709(c) (192.743(a), 192.743(b), 192.743(c))

Question Text *Do records indicate testing or review of the capacity of each pressure relief device at each pressure limiting station and pressure regulating station as required?*

Assets Covered 86257

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

47. Question Result, ID, References Sat, MO.GM.RECORDS.R, 192.605(b)(1) (192.243(f), 192.709(a), 192.709(b), 192.709(c)) (also presented in: MO.GM)

Question Text *Do records indicate that records are maintained of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test?*

Assets Covered 86257

Result Notes Patrols are done every year. RRs and roads are done 2x year.

11/6/2017, 5/9/2017 and 1/6/2019

10/2/2018 and 4/12/2018

1/13/2019 (part of a leak survey) 10/7/2019, 6/3/2019

48. Question Result, ID, References NA, MO.GMOPP.PRESSREGTEST.R, 192.709(c) (192.739(a), 192.739(b))

Question Text *Do records indicate inspection and testing of pressure limiting, relief devices, and pressure regulating stations?*

Assets Covered 86257

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

49. Question Result, ID, References NA, MO.GMOPP.PRESSREGTEST.O, 192.739(a) (192.739(b), 192.743)

Question Text *Are field or bench tests or inspections of regulating stations, pressure limiting stations or relief devices adequate?*

Assets Covered 86257

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

MO.RW: ROW Markers, Patrols, Leakage Survey and Monitoring

50. Question Result, ID, References **Sat, MO.RW.PATROL.R, 192.709(c) (192.705(a), 192.705(b), 192.705(c))** (also presented in: PD.RW)
Question Text *Do records indicate that ROW surface conditions have been patrolled as required?*
Assets Covered **86257**
51. Question Result, ID, References **Sat, MO.RW.ROWMARKER.O, 192.707(a) (192.707(b), 192.707(c), 192.707(d))** (also presented in: DC.COMM, PD.RW)
Question Text *Are line markers placed and maintained as required?*
Assets Covered **86257**
Result Notes **The operator stated they added new stickers to the line markers to replace weathered markings recently. All observed appeared to be readily visible.**
52. Question Result, ID, References **Sat, MO.RW.ROWCONDITION.O, 192.705(a) (192.705(c))** (also presented in: DC.COMM, PD.RW)
Question Text *Are the ROW conditions acceptable for the type of patrolling used?*
Assets Covered **86257**
Result Notes **The line can be walked or observed from the rural road it runs next to.**
53. Question Result, ID, References **Sat, MO.RW.LEAKAGE.R, 192.709(c) (192.706, 192.706(a), 192.706(b), 192.935(d))**
Question Text *Do records indicate leakage surveys conducted as required?*
Assets Covered **86257**
Result Notes **June 13 2019**

April 12, 2018

May 9, 2017

PD.DP: Damage Prevention

54. Question Result, ID, References **Sat, PD.DP.PDPROGRAM.R, 192.614(c)** (also presented in: DC.COMM)
Question Text *Does the damage prevention program meet minimum requirements specified in 192.614(c)?*
Assets Covered **86257**
Result Notes **Cosentino used to send out a damage prevention fliers. One was sent in Nov 2018. The Compliance Group will be doing this in house for 2020**

PD.PA: Public Awareness

55. Question Result, ID, References **Sat, EP.ERG.LIAISON.R, 192.605(a) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), ADB-05-03)** (also presented in: DC.COMM, EP.ERG)
Question Text *Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?*
Assets Covered **86257**
Result Notes **Simplot hosted LEPC meetings for 12/12/2019, 12/13/2018, and they have monthly meetings. They present once every year. Norco, Nuriyon, and others are listed as attendees.**
56. Question Result, ID, References **Sat, PD.PA.LANGUAGE.R, 192.616(g) (API RP 1162 Section 2.3.1)**
Question Text *Were materials and messages developed and delivered in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?*
Assets Covered **86257**

PD.RW: ROW Markers, Patrols, Monitoring

57. Question Result, ID, References **Sat, MO.RW.PATROL.R, 192.709(c) (192.705(a), 192.705(b), 192.705(c))** (also presented in: MO.RW)

Question Text *Do records indicate that ROW surface conditions have been patrolled as required?*
Assets Covered 86257

58. Question Result, ID, Sat, MO.RW.ROWMARKER.O, 192.707(a) (192.707(b), 192.707(c), 192.707(d)) (also presented in:
References DC.COMM, MO.RW)

Question Text *Are line markers placed and maintained as required?*
Assets Covered 86257

Result Notes *The operator stated they added new stickers to the line markers to replace weathered markings recently. All observed appeared to be readily visible.*

59. Question Result, ID, Sat, MO.RW.ROWCONDITION.O, 192.705(a) (192.705(c)) (also presented in: DC.COMM, MO.RW)
References

Question Text *Are the ROW conditions acceptable for the type of patrolling used?*
Assets Covered 86257

Result Notes *The line can be walked or observed from the rural road it runs next to.*

RPT.RR: Regulatory Reporting (Traditional)

60. Question Result, ID, Sat, RPT.RR.ANNUALREPORT.R, 191.17(a)
References

Question Text *Have complete and accurate Annual Reports been submitted?*
Assets Covered 86257

Result Notes *Annual reports were reviewed from 2017-2019 It shows 1.4 miles in a Class 1 built in 2009, with no HCAs. For 2017, 1 mile was listed in the AR, but for 2018 and 2019 the mileage was 1.4 miles. This appears to be a rounding issue and has no impact on HCA calculation for the purposes of this operator.*

61. Question Result, ID, NA, RPT.RR.IMMEDREPORT.R, 191.5(a) (191.7(a))
References

Question Text *Do records indicate immediate notifications of incidents were made in accordance with 191.5?*
Assets Covered 86257

Result Notes *No such event occurred, or condition existed, in the scope of inspection review.*

62. Question Result, ID, NA, RPT.RR.INCIDENTREPORTSUPP.R, 191.15(d)
References

Question Text *Do records indicate accurate supplemental incident reports were filed and within the required timeframe?*
Assets Covered 86257

Result Notes *No such event occurred, or condition existed, in the scope of inspection review.*

63. Question Result, ID, NA, RPT.RR.INCIDENTREPORT.R, 191.15(a)
References

Question Text *Do records indicate reportable incidents were identified and reports were submitted to DOT on Form 7100.2 within the required timeframe?*

Assets Covered 86257

Result Notes *No such event occurred, or condition existed, in the scope of inspection review.*

64. Question Result, ID, NA, RPT.RR.SRCR.R, 191.23(a) (191.23(b), 191.25(a), 191.25(b))
References

Question Text *Do records indicate safety-related condition reports were filed as required?*
Assets Covered 86257

Result Notes *No such event occurred, or condition existed, in the scope of inspection review.*

65. Question Result, ID, Sat, RPT.RR.NPMSANNUAL.R, 191.29(a) (191.29(b))
References

Question Text *Do records indicate NPMS submissions were completed each year, on or before March 15, representing all in service, idle and retired assets as of December 31 of the previous year (excludes distribution lines and gathering lines) occurred, and that if no modifications occurred, an email was submitted stating that fact?*

Assets Covered 86257

Result Notes *We reviewed the 2018 and 2019 submissions to PHMSA.*

66. Question Result, ID, Sat, RPT.RR.OPID.R, 191.22(a) (191.22(c), 191.22(d))
References

Question Text *Do records indicate appropriate obtaining, and control of, Operator Identification Numbers (OPIDs), including changes in entity, acquisition/divestiture, and construction/update/uprate?*

Assets Covered 86257

Result Notes *Simplot obtained an OPID some time ago when they became regulated. There have been no changes.*

TD.ATM: Atmospheric Corrosion

67. Question Result, ID, References *NA, TD.ATM.ATMCORRODEINSP.O, 192.481(b) (192.481(c), 192.479(a), 192.479(b), 192.479(c))*

Question Text *Is pipe that is exposed to atmospheric corrosion protected?*

Assets Covered 86257

Result Notes *No such relevant facilities/equipment existed in the scope of inspection review.*

68. Question Result, ID, References *NA, TD.ATM.ATMCORRODEINSP.R, 192.491(c) (192.481(a), 192.481(b), 192.481(c))*

Question Text *Do records document inspection of aboveground pipe for atmospheric corrosion?*

Assets Covered 86257

Result Notes *No such relevant facilities/equipment existed in the scope of inspection review.*

TD.CPMONITOR: External Corrosion - CP Monitoring

69. Question Result, ID, References *NA, TD.CPMONITOR.CURRENTTEST.R, 192.491(c) (192.465(b))*

Question Text *Do records document details of electrical checks of sources of rectifiers or other impressed current sources?*

Assets Covered 86257

Result Notes *No such relevant facilities/equipment existed in the scope of inspection review.*

70. Question Result, ID, References *NA, TD.CPMONITOR.MONITORCRITERIA.O, 192.465(a) (192.463(a))*

Question Text *Are methods used for taking CP monitoring readings that allow for the application of appropriate CP monitoring criteria?*

Assets Covered 86257

Result Notes *No such relevant facilities/equipment existed in the scope of inspection review.*

71. Question Result, ID, References *NA, TD.CPMONITOR.TEST.R, 192.491(c) (192.465(a))*

Question Text *Do records adequately document cathodic protection monitoring tests have occurred as required?*

Assets Covered 86257

Result Notes *No such relevant facilities/equipment existed in the scope of inspection review.*

72. Question Result, ID, References *NA, TD.CPMONITOR.CURRENTTEST.O, 192.465(b)*

Question Text *Are impressed current sources properly maintained and are they functioning properly?*

Assets Covered 86257

Result Notes *No such relevant facilities/equipment existed in the scope of inspection review.*

73. Question Result, ID, References *NA, TD.CPMONITOR.REVCURRENTTEST.R, 192.491(c) (192.465(c))*

Question Text *Do records document details of electrical checks interference bonds, diodes, and reverse current switches?*

Assets Covered 86257

Result Notes *No such relevant facilities/equipment existed in the scope of inspection review.*

74. Question Result, ID, References *NA, TD.CPMONITOR.DEFICIENCY.R, 192.491(c) (192.465(d))*

Question Text *Do records adequately document actions taken to correct any identified deficiencies in corrosion control?*

Assets Covered 86257

Result Notes *No such relevant facilities/equipment existed in the scope of inspection review.*

75. Question Result, ID, References **NA, TD.CP.MONITOR.TESTLEAD.R, 192.491(c) (192.471(a), 192.471(b), 192.471(c))**
 Question Text *Do records document that pipelines with cathodic protection have electrical test leads installed in accordance with requirements of Subpart I?*
 Assets Covered **86257**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
76. Question Result, ID, References **NA, TD.CP.MONITOR.INTFRCURRENT.R, 192.491(c) (192.473(a))**
 Question Text *Do records document an effective program is in place to minimize detrimental effects of interference currents and that detrimental effects of interference currents from CP systems on other underground metallic structures are minimized?*
 Assets Covered **86257**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
77. Question Result, ID, References **NA, TD.CP.RECORDS.R, 192.491(a)** (also presented in: TD.CP, TD.CPEXPOSED)
 Question Text *Do records indicate the location of all items listed in 192.491(a)?*
 Assets Covered **86257**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

TD.CP: External Corrosion - Cathodic Protection

78. Question Result, ID, References **NA, TD.CP.POST1971.R, 192.491(c) (192.455(a), 192.457(a), 192.452(a), 192.452(b))**
 Question Text *Do records document that each buried or submerged pipeline installed after July 31, 1971, has been protected against external corrosion with a cathodic protection system within 1 year after completion of construction, conversion to service, or becoming jurisdictional onshore gathering?*
 Assets Covered **86257**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
79. Question Result, ID, References **NA, TD.CP.PRE1971.O, 192.457(b)**
 Question Text *Are bare or coated pipes in compressor, regulator or meter stations installed before August 1, 1971 (except for cast and ductile iron lines) cathodically protected in areas where active corrosion was found in accordance with Subpart I or Part 192?*
 Assets Covered **86257**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
80. Question Result, ID, References **NA, TD.CP.UNPROTECT.R, 192.491(c) (192.465(e))**
 Question Text *Do records adequately document the re-evaluation of non-cathodically protected buried pipelines for areas of active corrosion?*
 Assets Covered **86257**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
81. Question Result, ID, References **NA, TD.CP.ELECISOLATE.R, 192.491(c) (192.467(a), 192.467(b), 192.467(c), 192.467(d), 192.467(e))**
 Question Text *Do records adequately document electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?*
 Assets Covered **86257**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
82. Question Result, ID, References **NA, TD.CP.RECORDS.R, 192.491(a)** (also presented in: TD.CP.MONITOR, TD.CPEXPOSED)
 Question Text *Do records indicate the location of all items listed in 192.491(a)?*
 Assets Covered **86257**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

TD.COAT: External Corrosion - Coatings

83. Question Result, ID, References **NA, TD.COAT.NEWPIPE.R, 192.491(c) (192.455(a)(1), 192.461(a), 192.461(b), 192.483(a))**
Question Text *Do records document that each buried or submerged pipeline installed after July 31, 1971 has been externally coated with a suitable coating material?*
Assets Covered **86257**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

TD.CPEXPOSED: External Corrosion - Exposed Pipe

84. Question Result, ID, References **NA, TD.CPEXPOSED.EXPOSEINSPECT.R, 192.491(c) (192.459)**
Question Text *Do records adequately document that exposed buried piping was examined for corrosion and deteriorated coating?*
Assets Covered **86257**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
85. Question Result, ID, References **NA, TD.CP.RECORDS.R, 192.491(a)** (also presented in: TD.CPMONITOR, TD.CP)
Question Text *Do records indicate the location of all items listed in 192.491(a)?*
Assets Covered **86257**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

TD.ICP: Internal Corrosion - Preventive Measures

86. Question Result, ID, References **NA, TD.ICP.EXAMINE.R, 192.491(c) (192.475(a), 192.475(b))**
Question Text *Do records document examination of removed pipe for evidence of internal corrosion?*
Assets Covered **86257**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
87. Question Result, ID, References **NA, TD.ICP.EVALUATE.R, 192.491(c) (192.485(c))**
Question Text *Do records document adequate evaluation of internally corroded pipe?*
Assets Covered **86257**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
88. Question Result, ID, References **NA, TD.ICP.REPAIR.R, 192.485(a) (192.485(b))**
Question Text *Do records document the repair or replacement of pipe that has been internally corroded to an extent that there is not sufficient remaining strength in the pipe wall?*
Assets Covered **86257**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

TQ.PROT9: OQ Protocol 9

89. Question Result, ID, References **NA, TQ.PROT9.CORRECTION.O, 192.801(a) (192.809(a))**
Question Text *Have potential issues identified by the OQ plan inspection process been corrected at the operational level?*
Assets Covered **86257**
Result Notes **No such activity/condition was observed during the inspection.**
90. Question Result, ID, References **Sat, TQ.PROT9.TASKPERFORMANCE.O, 192.801(a) (192.809(a))** (also presented in: DC.COMM)
Question Text *Verify the qualified individuals performed the observed covered tasks in accordance with the operator's processes or operator approved contractor processes.*
Assets Covered **86257**

Result Notes The operator was able to detail AOCs and used safe work practices when operating the valve.

91. Question Result, ID, References Sat, TQ.PROT9.QUALIFICATIONSTATUS.O, 192.801(a) (192.809(a))

Question Text *Verify the individuals performing the observed covered tasks are currently qualified to perform the covered tasks.*

Assets Covered 86257

Result Notes Valve operation

Hector CT-22A Valve Function Test (Tested 3/24/2020 Exp 3/24/2023) Open/Close Valves (Tested 3/27/2020 Exp 3/27/2023)

Hector Locating Facilites (Tested 3/28/2020 Exp 3/25/2023)

Locates

92. Question Result, ID, References Sat, TQ.PROT9.AOCRECOG.O, 192.801(a) (192.809(a))

Question Text *Verify the individuals performing covered tasks are cognizant of the AOCs that are applicable to the tasks observed.*

Assets Covered 86257

Result Notes The operator performing the inspection was cognizant of AOCs.

93. Question Result, ID, References Sat, TQ.PROT9.VERIFYQUAL.O, 192.801(a) (192.809(a))

Question Text *Observe in the field (job site, local office, etc.) that the foreman/supervisor/manager has verified the qualification of the individual performing the task, that the qualification records are current, and ensure the personal identification of all individuals performing covered tasks are checked, prior to task performance.*

Assets Covered 86257

Result Notes Lance Carter performed the OQ checks prior to task performance and provided the inspection team with the needed records.

TQ.OQ: Operator Qualification

94. Question Result, ID, References NA, TQ.OQ.OQCONTRACTOR.R, 192.807(a) (192.807(b))

Question Text *Are adequate records containing the required elements maintained for contractor personnel?*

Assets Covered 86257

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

95. Question Result, ID, References Sat, TQ.OQ.RECORDS.R, 192.807 (also presented in: DC.COMM)

Question Text *Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified?*

Assets Covered 86257

Result Notes I reviewed the MEA and EWN records for present and past employees.

TQ.QU: Qualification of Personnel - Specific Requirements

96. Question Result, ID, References NA, TQ.QU.CORROSION.R, 192.453 (192.807(a), 192.807(b))

Question Text *Do records indicate qualification of personnel implementing pipeline corrosion control methods?*

Assets Covered 86257

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

TQ.QUOMCONST: Qualification of Personnel - Specific Requirements (O and M Construction)

97. Question Result, ID, References NA, TQ.QUOMCONST.NDT.R, 192.243(b)(2) (192.807(a), 192.807(b), 192.328(a), 192.328(b))

Question Text *Do records indicate the qualification of nondestructive testing personnel?*

Assets Covered 86257

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

98. Question Result, ID, References NA, TQ.QUOMCONST.WELDER.R, 192.227(a) (192.227(b), 192.229(a), 192.229(b), 192.229(c), 192.229(d), 192.328(a), 192.328(b), 192.807(a), 192.807(b))

Question Text *Do records indicate that welders are adequately qualified?*

Assets Covered 86257

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

TQ.TR: Training of Personnel

99. Question Result, ID, References Sat, TQ.TR.TRAINING.R, 192.615(b)(2) (192.807(a), 192.807(b)) (also presented in: DC.COMM)

Question Text *Is training for emergency response personnel documented?*

Assets Covered 86257

Result Notes ERT 2019 training was Nov 14, 2019. Lance, Andy, Hector, Matthew all attended the training. 2018 was reviewed as well and 5 attendees.

Report Parameters: Results: all

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