

# Inspection Output (IOR)

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## Inspection Information

Inspection Name	8258 CNGC HQ O&M/Procedures	Operator(s)	CASCADE NATURAL GAS CORP (2128)	Plan Submitted	12/23/2020
Status	PLANNED	Lead	Scott Rukke	Plan Approval	12/28/2020 by Joe Subsit
Start Year	2021	Lead+		All Activity Start	01/25/2021
System Type	GD	Team Members	David Cullom, Dennis Ritter, Lex Vinsel, Anthony Dorrough, Derek Norwood, Scott Anderson, Darren Tinnerstet	All Activity End	01/29/2021
Protocol Set ID	WA.GD.2020.02	Observer(s)	Deborah Becker, Rell Koizumi	Inspection Submitted	--
		Supervisor	Joe Subsit	Inspection Approval	--
		Director	Sean Mayo		

## Inspection Summary

### Inspection Scope and Summary

This is a Company Headquarters O&M Review of Cascade Natural Gas #8258

### Facilities visited and Total AFOD

1/25/2021 travel and prep

1/26/2021 in office

1/27/2021 in office and exit interview

1/28/2021 travel and documentation

### Summary of Significant Findings

*No findings.*

### Primary Operator contacts and/or participants

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## Scope (Assets)

Short # Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1. 88961 (75)	Cascade Natural Gas-HEADQUARTERS	unit	88961	Storage Fields Bottle/Pipe - Holders Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric Abandoned	119	119	119	119	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. 88961 (75)	Baseline Procedures (Form 2)	PRO, PRR, FR, GDIM, MMLPGIM, MISCTOPICS, GENERIC	P, R, O, S		Detail

## Plan Implementations

# Activity Name	SMAR T Act#	Start Date End Date	Focus Directives	Involved Groups/Subgroups	Asset s	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete
1 Procedures Review	--	01/25/2021 01/29/2021	n/a	all planned questions	all assets	all types	119	119	119	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

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1.	Attendance List	Procedures Review	COMPLETED	01/28/2021	Procedures Review	88961 (75)

## Results (all values, 119 results)

120 (instead of 119) results are listed due to re-presentation of questions in more than one sub-group.

### PRO.REPORT: Reporting

1. Question Result, ID, References Sat, RPT.RR.IMMEDREPORT.P, 191.5(b) (191.7(a), 191.7(d))

Question Text *Is there a process to immediately report incidents to the National Response Center?*

Assets Covered 88961 (75)

Result Notes OPS 9 step 3.3

Reviewed procedures and all requirements appear to be present.

2. Question Result, ID, References **Sat, RPT.RR.EMERGENCYNOTIFY.P,**  
 Question Text *Does the manual include procedures to notify the commission of certain incidents or hazardous conditions within the required time frame?*  
 Assets Covered **88961 (75)**  
 Result Notes **OPS 9 Appendix 1**
  
3. Question Result, ID, References **Sat, RPT.RR.INCIDENTREPORT.P, 191.9(a)**  
 Question Text *Does the process require preparation and filing of an incident report as soon as practicable but no later than 30 days after discovery of a reportable incident?*  
 Assets Covered **88961 (75)**  
 Result Notes **OPS 9 step 3.8**
  
4. Question Result, ID, References **Sat, RPT.RR.THIRTYDAYRPT.P,**  
 Question Text *Does the manual include procedures to submit a written report to the commission within thirty days of the initial telephonic report?*  
 Assets Covered **88961 (75)**  
 Result Notes **OPS 9 appendix 1, step D**
  
5. Question Result, ID, References **Sat, RPT.RR.INCIDENTREPORTSUPP.P, 191.9(b)**  
 Question Text *Does the process require preparation and filing of supplemental incident reports?*  
 Assets Covered **88961 (75)**  
 Result Notes **OPS 9, section E, additional relevant information**
  
6. Question Result, ID, References **Sat, RPT.RR.OPID.P, 191.22(a) (191.22(c), 191.22(d))**  
 Question Text *Does the process require the obtaining, and appropriate control, of Operator Identification Numbers (OPIDs), including changes in entity, acquisition/divestiture, and construction/update/uprate?*  
 Assets Covered **88961 (75)**  
 Result Notes **OPS 10, 4.2.1**
  
7. Question Result, ID, References **Sat, RPT.RR.SRCR.P, 192.605(a) (191.23(a), 191.23(b), 191.25(a), 191.25(c))**  
 Question Text *Do the procedures require reporting of safety-related conditions?*  
 Assets Covered **88961 (75)**  
 Result Notes **OPS 9, section 8**
  
8. Question Result, ID, References **Sat, MO.GO.SRC.P, 192.605(a) (192.605(d), 191.23(a))**  
 Question Text *Does the process include instructions enabling personnel who perform operation and maintenance activities to recognize conditions that may potentially be safety-related conditions?*  
 Assets Covered **88961 (75)**  
 Result Notes **OPS 9, 7.8.4**
  
9. Question Result, ID, References **Sat, DC.CO.FILEREQ.P,**  
 Question Text *Do procedures include requirements to file documents with the UTC at least 45 days prior to operation or construction of a pipeline?*  
 Assets Covered **88961 (75)**  
 Result Notes **OPS 10, section 8.3**
  
10. Question Result, ID, References **Sat, FS.FG.PROXCON.P,**  
 Question Text *Are procedures in place to submit a written request to the commission prior to operating a gas pipeline in the areas and pressures designated in WAC 480-93-020?*  
 Assets Covered **88961 (75)**

Result Notes OPS 10, step 13,

11. Question Result, ID, References Sat, RPT.RR.MAOPINCREASEPLANS.P,  
Question Text *Do procedures require filing with the commission 45 days prior to uprating to a MAOP greater than 60 psig?*  
Assets Covered 88961 (75)  
Result Notes CP 620, step 021
12. Question Result, ID, References Sat, RPT.RR.DIRTREPORTS.P,  
Question Text *Do procedures require a report (i.e., DIRT Report) to be submitted to the commission and provide excavators with the required information in the event of damage to their gas pipeline?*  
Assets Covered 88961 (75)  
Result Notes OPS 10
13. Question Result, ID, References Sat, RPT.RR.DAILYCONSTRUCTIONRPT.P,  
Question Text *Do procedures require daily construction and repair activities to be emailed to the commission no later than 10 AM each day work is scheduled?*  
Assets Covered 88961 (75)  
Result Notes OPS 10 section 18.4

### PRO.SUBACUSTEFV: Customer and EFV Installation Notification

14. Question Result, ID, References Sat, MO.GO.CUSTNOTIFY.P, 192.13(c) (192.16(a), 192.16(b), 192.16(c), 192.16(d))  
Question Text *Is a customer notification process in place that satisfies the requirements of 192.16?*  
Assets Covered 88961 (75)  
Result Notes OPS 10, section 17.1
15. Question Result, ID, References Sat, MO.GO.EFVINSTALL.P, 192.383(b) (192.381(a), 192.381(b), 192.381(c), 192.381(d), 192.381(e), 192.383(a), 192.383(c))  
Question Text *Is there an adequate excess flow valve (EFV) installation and performance program in place?*  
Assets Covered 88961 (75)  
Result Notes OPS 301

### PRO.SUBLNORMOPS: Normal Operating And Maintenance

16. Question Result, ID, References Sat, MO.GO.OMANNUALREVIEW.P, 192.605(a)  
Question Text *Does the process include a requirement to review the manual at intervals not exceeding 15 months, but at least once each calendar year?*  
Assets Covered 88961 (75)  
Result Notes OPS 8, step 2
17. Question Result, ID, References Sat, MO.GO.OMHISTORY.P, 192.605(a) (192.605(b)(3))  
Question Text *Does the process include requirements for making construction records, maps and operating history available to appropriate operating personnel?*  
Assets Covered 88961 (75)  
Result Notes CP 869, All field employees have laptops in the field and access to maps and records.
18. Question Result, ID, References Sat, MO.GOMAOP.MAOPLIMIT.P, 192.605(a) (192.605(b)(5))  
Question Text *Does the process include requirements for starting up and shutting down any part of the pipeline in a manner to assure operation with the MAOP limits, plus the build-up allowed for operation of pressure-limiting and control devices?*  
Assets Covered 88961 (75)

Result Notes CP 925 - Emergency Procedure

There are various aspects to starting up a pipeline after an outage. They appear to all reasonably be covered in various procedures.

19. Question Result, ID, References Sat, MO.GO.OMEFFECTREVIEW.P, 192.605(a) (192.605(b)(8))  
Question Text *Does the process include requirements for periodically reviewing 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 88961 (75)  
Result Notes OPS 10, 19.2 requires monthly random inspections of operator work.
20. Question Result, ID, References Sat, MO.GO.ODDOR.P, 192.605(a) (192.605(b)(11))  
Question Text *Does the process require prompt response to the report of a gas odor inside or near a building?*  
Assets Covered 88961 (75)  
Result Notes Inside is CP 724  
  
Outside is CP 750  
  
CP 925  
  
CP 714 8.2.10 requires personnel to go inside when gas is found at the building wall.
21. Question Result, ID, References Sat, AR.RMP.SAFETY.P, 192.605(b)(9) (192.713(b))  
Question Text *Does the process ensure that repairs are made in a safe manner and are made so as to prevent damage to persons and property?*  
Assets Covered 88961 (75)  
Result Notes CP 925 section 8.1
22. Question Result, ID, References Sat, MO.GM.MOVEANDLOWER.P,  
Question Text *Does the manual include procedures to prepare a study when moving or lowering metallic pipelines?*  
Assets Covered 88961 (75)  
Result Notes CP 622, 8.2.1
23. Question Result, ID, References Sat, MO.GM.ONSITEPROCS.P,  
Question Text *Does the manual require that procedures applicable to the work being done are located onsite where the work is being done?*  
Assets Covered 88961 (75)  
Result Notes OPS 8, all procedures are electronic

**PRO.SUBCLASS: Change In Class Location**

24. Question Result, ID, References Sat, MO.GOCLASS.CLASSLOCATESTUDY.P, 192.605(b)(1) (192.609(a), 192.609(b), 192.609(c), 192.609(d), 192.609(e), 192.609(f))  
Question Text *Does the process include a requirement that the operator conduct a study whenever an increase in population density indicates a change in the class location of a pipeline segment operating at a hoop stress that is more than 40% SMYS?*  
Assets Covered 88961 (75)  
Result Notes OPS 109 is being implemented throughout MDU which deals with pipelines operating above 40% SMYS. The new OPS 109 will be implemented in March 2021.
25. Question Result, ID, References Sat, MO.GOCLASS.CLASSLOCATEREV.P, 192.605(b)(1) (192.611(a), 192.611(b), 192.611(c), 192.611(d))

Question Text *Does the process include a requirement that the MAOP of a pipeline segment be confirmed or revised within 24 months whenever the hoop stress corresponding to the established MAOP is determined not to be commensurate with the existing class location?*

Assets Covered 88961 (75)

Result Notes OPS 109 is being implemented throughout MDU which deals with pipelines operating above 40% SMYS. The new OPS 109 will be implemented in March 2021.

## PRO.SUBLSURVEIL: Continuing Surveillance

26. Question Result, ID, References Sat, MO.GO.CONTSURVEILLANCE.P, 192.605(e) (192.613(a), 192.613(b), 192.703(b), 192.703(c))

Question Text *Are there processes for performing continuing surveillance of pipeline facilities, and also for reconditioning, phasing out, or reducing the MAOP in a pipeline segment that is determined to be in unsatisfactory condition but on which no immediate hazard exists?*

Assets Covered 88961 (75)

Result Notes OPS 610 - Patrolling and Continuing Surveillance.

## PRO.SUBLDAMAGEPREVENT: Damage Prevention Program

27. Question Result, ID, References Sat, PD.OC.PDPROGRAM.P, 192.614(a)

Question Text *Is a damage prevention program approved and in place?*

Assets Covered 88961 (75)

Result Notes CP 835

## PRO.SUBLEMERGOPS: Emergency

28. Question Result, ID, References Sat, EP.ERG.NOTICES.P, 192.615(a)(1)

Question Text *Does the emergency plan include procedures for receiving, identifying, and classifying notices of events which need immediate response?*

Assets Covered 88961 (75)

Result Notes CP 925 8.9 and Appendix 2 contains instructions for receiving calls.

29. Question Result, ID, References Sat, EP.ERG.COMMSYS.P, 192.615(a) (192.615(a)(2))

Question Text *Does the emergency plan include procedures for establishing and maintaining adequate means of communication with appropriate fire, police, and other public officials?*

Assets Covered 88961 (75)

Result Notes CP 925

30. Question Result, ID, References Sat, EP.ERG.RESPONSE.P, 192.615(a) (192.615(a)(3), 192.615(a)(11), 192.615(b)(1))

Question Text *Does the emergency plan include procedures for making a prompt and effective response to a notice of each type of emergency, including gas detected inside or near a building, a fire or explosion near or directly involving a pipeline facility, or a natural disaster?*

Assets Covered 88961 (75)

Result Notes 925 section 8. In addition CNG conducts 2X mock drills annually. Each district also has a site specific emergency plan tailored to district pipelines and valves.

31. Question Result, ID, References Sat, EP.ERG.READINESS.P, 192.615(a) (192.615(a)(4))

Question Text *Does the process include procedures for ensuring the availability of personnel, equipment, tools, and materials as needed at the scene of an emergency?*

Assets Covered 88961 (75)

Result Notes CP 925 8.1.

32. Question Result, ID, References Sat, EP.ERG.PUBLICPRIORITY.P, 192.615(a) (192.615(a)(5))

Question Text *Does the emergency plan include procedures for taking actions directed toward protecting people first and then property?*

Assets Covered 88961 (75)  
Result Notes CP 925, 8.1.1

33. Question Result, ID, References Sat, EP.ERG.PRESSREDUCESD.P, 192.615(a) (192.615(a)(6))  
Question Text *Does the emergency plan include procedures for the emergency shutdown or pressure reduction in any section of pipeline system necessary to minimize hazards to life or property?*  
Assets Covered 88961 (75)  
Result Notes CP 925, 8.4 District Shut Down Plan.
34. Question Result, ID, References Sat, EP.ERG.PUBLICHAZ.P, 192.605(a) (192.615(a)(7))  
Question Text *Does the emergency plan include procedures for making safe any actual or potential hazard to life or property?*  
Assets Covered 88961 (75)  
Result Notes CP 925
35. Question Result, ID, References Sat, EP.ERG.AUTHORITIES.P, 192.615(a) (192.615(a)(8))  
Question Text *Does the emergency plan include procedures for notifying appropriate public officials of gas pipeline emergencies and coordinating with them both planned responses and actual responses during an emergency?*  
Assets Covered 88961 (75)  
Result Notes CP 925 8.11.4
36. Question Result, ID, References Sat, EP.ERG.OUTAGERESTORE.P, 192.615(a) (192.615(a)(9))  
Question Text *Does the emergency plan include procedures for safely restoring any service outage?*  
Assets Covered 88961 (75)  
Result Notes CP 925 8.20 Restoring Service Outages.
37. Question Result, ID, References Sat, EP.ERG.INCIDENTACTIONS.P, 192.615(a) (192.615(a)(10))  
Question Text *Does the process include procedures for beginning action under 192.617, if applicable, as soon after the end of the emergency as possible?*  
Assets Covered 88961 (75)  
Result Notes CP 722 8.6.8.2 and 8.6.7.7
38. Question Result, ID, References Sat, EP.ERG.TRAINING.P, 192.615(b)(2)  
Question Text *Does the process include training of the appropriate operating personnel to assure they are knowledgeable of the emergency procedures and verifying that the training is effective?*  
Assets Covered 88961 (75)  
Result Notes CP 925 section 4.4. Documented on form 20231  
  
Mock drills conducted 2X year.  
  
Appendix 1 of this section details individual department responsibilities for emergency response.
39. Question Result, ID, References Sat, EP.ERG.POSTEVNTREVIEW.P, 192.615(b)(3)  
Question Text *Does the process include detailed steps for reviewing employee activities to determine whether the procedures were effectively followed in each emergency?*  
Assets Covered 88961 (75)  
Result Notes CP 925 8.24.3  
  
and 8.24.1 - Post Incident Review documented on form 23001.
40. Question Result, ID, References Sat, EP.ERG.LIAISON.P, 192.615(c) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), ADB-05-03)  
Question Text *Does the process include steps for establishing and maintaining liaison with appropriate fire, police and other public officials and utility owners?*

Assets Covered 88961 (75)

Result Notes CP 925 section 8.8 requires use of CP 500

CP 500 - Public Awareness Plan - identifies lists of various first responders who receive literature through PAPA.

## PRO.SUBLPUBAWARE: Public Awareness Program

41. Question Result, ID, References Sat, PD.PA.MSTRMETER.P, 192.616(j) (192.616(h)) (also presented in: MISCTOPICS.PUBAWARE)

Question Text *Does the public awareness program for a master meter or petroleum gas system meet the requirements of Part 192?*

Assets Covered 88961 (75)

Result Notes Master meters twice per year.

## PRO.SUBLFAILINV: Failure Investigation

42. Question Result, ID, References Sat, EP.ERG.INCIDENTANALYSIS.P, 192.617

Question Text *Does the process include procedures for analyzing accidents and failures, including the selection of samples of the failed facility or equipment for laboratory examination, where appropriate, for the purpose of determining the causes of the failure and minimizing the possibility of recurrence?*

Assets Covered 88961 (75)

Result Notes CP 722 8.5.4

Drug and alcohol is under 925 8.24.4 - refers to HR policy 1024

Appendix E "PHMSA Post Accident Testing"- Post accident flow chart

## PRO.SUBLMAOP: MAOP

43. Question Result, ID, References Sat, MO.GOMAOP.MAOPDETERMINE.P, 192.605(b)(1) (192.619(a), 192.619(b), 192.621(a), 192.621(b), 192.623(a), 192.623(b))

Question Text *Does the process include requirements for determining the maximum allowable operating pressure for a pipeline segment in accordance with 192.619?*

Assets Covered 88961 (75)

Result Notes CP 604 System Design

## PRO.SUBLPRESSTEST: Pressure Test

44. Question Result, ID, References Sat, AR.PTI.PRESSTESTACCEP.P, 192.503(a) (192.503(b), 192.503(c), 192.503(d), 192.505(a), 192.505(b), 192.505(c), 192.505(d), 192.505(e), 192.507(a), 192.507(b), 192.507(c), 192.513(a), 192.513(b), 192.513(c), 192.513(d))

Question Text *Were test acceptance criteria and procedures/processes sufficient to assure the basis for an acceptable pressure test?*

Assets Covered 88961 (75)

Result Notes Anything larger than 6-inch is engineering designed.

45. Question Result, ID, References Sat, AR.PTI.EQUIPCALIB.P,

Question Text *Does the manual include procedures to maintain and calibrate pressure testing equipment in accordance with manufacturer's recommendations?*

Assets Covered 88961 (75)

Result Notes OPS 501 section 2.1



Reviewed the MDUG list of calibration schedules.

## PRO.SUBLODOR: Odorization Of Gas

46. Question Result, ID, **Sat, MO.GOODOR.ODORIZE.P, 192.605(b)(1) (192.625(a), 192.625(b), 192.625(c), 192.625(d),**  
References **192.625(e), 192.625(f)**  
Question Text *Does the process ensure appropriate odorant levels are contained in its combustible gases in accordance with 192.625?*  
Assets Covered **88961 (75)**  
Result Notes **OPS 612, section 1.1**
- 4% gas is the basis for their odorization which has changed in the last 6 months. .8 is not the minimum threshold.

## PRO.SUBLTAP: Tapping Pipelines Under Pressure

47. Question Result, ID, **Sat, AR.RMP.HOTTAP.P, 192.605(b)(1) (192.627)**  
References  
Question Text *Is the process adequate for tapping pipelines under pressure?*  
Assets Covered **88961 (75)**  
Result Notes **OPS 600**
48. Question Result, ID, **Sat, TQ.QU.HOTTAPQUAL.P, 192.627 (192.805(b))**  
References  
Question Text *Does the process require taps on a pipeline under pressure (hot taps) to be performed by qualified personnel?*  
Assets Covered **88961 (75)**  
Result Notes **Yes. OPS 600. Employees performing hot taps are qualified for distribution taps at a maximum diameter and specialized crews are qualified for larger higher pressure taps.**

## PRO.SUBLPURGE: Pipeline Purging

49. Question Result, ID, **Sat, MO.GO.PURGE.P, 192.605(b)(1) (192.629(a), 192.629(b))**  
References  
Question Text *Does the process include requirements for purging of pipelines in accordance with 192.629?*  
Assets Covered **88961 (75)**  
Result Notes **OPS 603.**

## PRO.SUBLINEMARK: Line Marker

50. Question Result, ID, **Sat, MO.RW.ROWMARKER.P, 192.707(a) (192.707(b), 192.707(d), CGA Best Practices, v4.0, Practice 2-5, CGA Best Practices, v4.0, Practice 4-20)**  
References  
Question Text *Does the process adequately cover the requirements for placement of ROW markers?*  
Assets Covered **88961 (75)**  
Result Notes **Cp 610.**
51. Question Result, ID, **Sat, MO.RW.MARKERSURVEY.P,**  
References  
Question Text *Are procedures in place to survey pipeline markers at specified intervals?*  
Assets Covered **88961 (75)**  
Result Notes **CP 610 8.5.3**
52. Question Result, ID, **Sat, MO.RW.MARKERREPLACE.P,**  
References  
Question Text *Does the manual include procedures to replace damaged or missing markers within 45 days?*  
Assets Covered **88961 (75)**  
Result Notes **CP 610 section 8.5.10**

## PRO.SUBMPATROLDIST: Distribution System Patrolling & Leakage Survey

53. Question Result, ID, References Sat, MO.RW.DISTPATROL.P, 192.721(a) (192.721(b))  
Question Text *Does the process require distribution system patrolling to be conducted?*  
Assets Covered 88961 (75)  
Result Notes OPS 610 2.5 indicates inside business district and outside BD
54. Question Result, ID, References Sat, MO.RW.DISTLEAKAGE.P, 192.723(a) (192.723(b))  
Question Text *Does the process require distribution system leakage surveys to be conducted?*  
Assets Covered 88961 (75)  
Result Notes CP 715 section 8.4
55. Question Result, ID, References Sat, MO.RW.CASINGLEAKSURVEY.P,  
Question Text *Does the process require shorted casings be leak surveyed as required?*  
Assets Covered 88961 (75)  
Result Notes CP 755
56. Question Result, ID, References Sat, MO.RW.MOVEANDLOWERSURVEY.P,  
Question Text *Does the manual include procedures to leak survey not more than thirty days after a metallic pipeline has been moved or lowered?*  
Assets Covered 88961 (75)  
Result Notes CP 622 section 8.3.2
57. Question Result, ID, References Sat, MO.RW.LEAKGRADE.P,  
Question Text *Do procedures require grading/re-grading leaks and evaluating the concentration and extent of leakage?*  
Assets Covered 88961 (75)  
Result Notes CP 750
58. Question Result, ID, References Sat, MO.RW.LEAKPERIMETER.P,  
Question Text *Do procedures require checking the perimeter of a gas leak with a combustible gas indicator?*  
Assets Covered 88961 (75)  
Result Notes CP 750
59. Question Result, ID, References Sat, MO.RW.LEAKFOLLOW.P,  
Question Text *Do procedures require performing a follow-up inspection on all leak repairs with residual gas remaining in the ground not later than thirty days after the repair?*  
Assets Covered 88961 (75)  
Result Notes CP 750 8.12.2.2

## PRO.SUBMPATROLEAK: Transmission System Patrolling & Leakage Survey

60. Question Result, ID, References Sat, MO.RW.TRANSPATROL.P, 192.705(a) (192.705(b), 192.705(c))  
Question Text *Does the process adequately cover the requirements for transmission line patrolling the ROW and conditions reported?*  
Assets Covered 88961 (75)  
Result Notes OPS 610

61. Question Result, ID, References **Sat, MO.RW.TRANSLEAKAGE.P, 192.706 (192.706(a), 192.706(b))**  
Question Text *Does the process require transmission leakage surveys to be conducted?*  
Assets Covered **88961 (75)**  
Result Notes **CP 715 section 8.4**

### **PRO.SUBMSVCREINSTATE: Test Requirements For Reinstating Service Lines**

62. Question Result, ID, References **Sat, AR.RMP.TESTREINSTATE.P, 192.605(b) (192.725(a), 192.725(b))**  
Question Text *Is the process adequate for the testing of disconnected service lines?*  
Assets Covered **88961 (75)**  
Result Notes **CP 665 .032**

### **PRO.SUBMOVERPRESS: Pressure Limiting And Regulating Station**

63. Question Result, ID, References **Sat, MO.GMOPP.PRESSREGTEST.P, 192.605(b)(1) (192.739(a), 192.739(b))**  
Question Text *Does the process include procedures for inspecting and testing each pressure limiting station, relief device, and pressure regulating station and their equipment?*  
Assets Covered **88961 (75)**  
Result Notes **OPS 500 section 1.6**

64. Question Result, ID, References **Sat, MO.GMOPP.PRESSREGMETER.P, 192.605(b)(1) (192.741(a), 192.741(b), 192.741(c))**  
Question Text *Does the process require telemetering or recording gauges be utilized as required for distribution systems?*  
Assets Covered **88961 (75)**  
Result Notes **CP 735 8.4**

65. Question Result, ID, References **Sat, MO.GMOPP.PRESSREGCAP.P, 192.605(b)(1) (192.743(a), 192.743(b), 192.743(c))**  
Question Text *Does the process include procedures for ensuring that the capacity of each pressure relief device at pressure limiting stations and pressure regulating stations is sufficient?*  
Assets Covered **88961 (75)**  
Result Notes **CP 602**

**And OPS 602 4.1**

66. Question Result, ID, References **Sat, MO.GMOPP.MULTIPRESSREG.P,**  
Question Text *Does the manual include procedures to install two or more regulator stations in a manner that will provide protection between the stations?*  
Assets Covered **88961 (75)**  
Result Notes **CP 602 4.4**

67. Question Result, ID, References **Sat, DC.METERREGSVC.REGTEST.P,**  
Question Text *Does the manual have procedures for testing service regulators and associated safety devices during initial turn-on and when a customer experiences a pressure problem?*  
Assets Covered **88961 (75)**  
Result Notes **CP 684 section 8.6.1.2**

### **PRO.SUBMVALVE: Valve And Vault Maintenance**

68. Question Result, ID, References **Sat, MO.GM.DISTVALVEINSPECT.P, 192.605(b)(1) (192.747(a), 192.747(b))**

Question Text *Does the process include procedures for inspecting and partially operating each distribution system valve that might be required in an emergency at intervals not exceeding 15 months, but at least once each calendar year and for taking prompt remedial action to correct any valve found inoperable?*

Assets Covered 88961 (75)

Result Notes OPS 703 section 3.2

## PRO.SUBMVAULT: Vault Inspection

69. Question Result, ID, References Sat, FS.FG.VAULTINSPECT.P, 192.605(b)(1) (192.749(a), 192.749(b), 192.749(c), 192.749(d))

Question Text *What are process requirements for inspecting vaults having a volumetric internal content of 200 cubic feet (5.66 cubic meters) that house pressure regulating/limiting equipment?*

Assets Covered 88961 (75)

Result Notes CP 700 section 8.1.10.1

## PRO.SUBMIGNITE: Prevention Of Accidental Ignition

70. Question Result, ID, References Sat, MO.GM.IGNITION.P, 192.605(b)(1) (192.751(a), 192.751(b), 192.751(c))

Question Text *Are there processes for minimizing the danger of accidental ignition where gas constitutes a hazard of fire or explosion?*

Assets Covered 88961 (75)

Result Notes CP 925 section 8.12.2

## PRO.SUBEWELD: Welding And Weld Defect Repair/removal

71. Question Result, ID, References Sat, DC.WELDPROCEDURE.WELD.P, 192.225(a) (192.225(b))

Question Text *Does the process require welding to be performed by qualified welders using qualified welding procedures and are welding procedures and qualifying tests required to be recorded in detail?*

Assets Covered 88961 (75)

Result Notes CP 750

API 1104

72. Question Result, ID, References Sat, TQ.QUOMCONST.WELDER.P, 192.227(a) (192.225(a), 192.225(b), 192.328(a), 192.328(b))

Question Text *Does the process require welders to be qualified in accordance with API 1104 or the ASME Boiler & Pressure Vessel Code?*

Assets Covered 88961 (75)

Result Notes CP 750 - API 1104 qualified

73. Question Result, ID, References Sat, TQ.QUOMCONST.WELDERLOWSTRESS.P, 192.227(b) (192.225(a), 192.225(b), 192.805(b))

Question Text *Does the process require welders who perform welding on low stress pipe on lines that operate at < 20% SMYS to be qualified under Section I of Appendix C to Part 192, and are welders who perform welding on service line connection to a main required to be qualified under Section II of Appendix C to Part 192?*

Assets Covered 88961 (75)

Result Notes CP 750. All welders are API 1104 qualified.

74. Question Result, ID, References Sat, DC.WELDERQUAL.WELDERLIMITNDT.P, 192.303 (192.229(a), 192.229(b), 192.229(c), 192.229(d))

Question Text *Does the process require certain limitations be placed on welders and welding operators?*

Assets Covered 88961 (75)

Result Notes CP 750

75. Question Result, ID, References Sat, DC.WELDPROCEDURE.WELDWEATHER.P, 192.303 (192.231)

Question Text *Does the process require welding to be protected from weather conditions that would impair the quality of the completed weld?*

Assets Covered 88961 (75)  
Result Notes CP 760 8.10.2

76. Question Result, ID, References Sat, DC.WELDPROCEDURE.MITERJOINT.P, 192.303 (192.233(a), 192.233(b), 192.233(c))

Question Text *Does the process prohibit the use of certain miter joints?*

Assets Covered 88961 (75)

Result Notes CP 605 8.6.5. No miter joints arrived. Section

77. Question Result, ID, References Sat, DC.WELDPROCEDURE.WELDPREP.P, 192.303 (192.235)

Question Text *Does the process require certain preparations for welding, in accordance with 192.235?*

Assets Covered 88961 (75)

Result Notes CP 760 8.10

78. Question Result, ID, References Sat, DC.WELDPROCEDURE.ESSENTIAL.P,

Question Text *Does the process require documenting essential variables when qualifying welders and weld procedures?*

Assets Covered 88961 (75)

Result Notes CNG records all essential variables and they are on their welder and weld procedure qualification forms. CNG uses all API 1104 procedures and all essential variables are measured and captured on CNG's forms.

79. Question Result, ID, References Sat, DC.WELDINSPECTOR.WELDVISUALQUAL.P, 192.303 (192.241(a), 192.241(b), 192.241(c))

Question Text *Does the process require visual inspections of welds to be conducted by qualified inspectors?*

Assets Covered 88961 (75)

Result Notes CP 760 section 8.12

80. Question Result, ID, References Sat, DC.WELDINSPECTOR.WELDREPAIR.P, 192.303 (192.245(a), 192.245(b), 192.245(c))

Question Text *Does the process require welds that are unacceptable to be removed and/or repaired as specified by 192.245?*

Assets Covered 88961 (75)

Result Notes CP 760 section 8.9

CNG does not allow a repair in a previously repair section 8.9 of 760.

Section 8.8 does not allow any cracks.

## PRO.SUBENDT: Nondestructive Testing

81. Question Result, ID, References Sat, DC.WELDINSPECTOR.WELDNDET.P, 192.243(a) (192.243(b), 192.243(c), 192.243(d), 192.243(e).)

Question Text *Is there a process for nondestructive testing and interpretation?*

Assets Covered 88961 (75)

Result Notes CP 760 8.8

## PRO.SUBEJOIN: Joining Of Pipeline Materials

82. Question Result, ID, References Sat, DC.CO.PLASTICJOINT.P, 192.273(b) (192.281(a), 192.281(b), 192.281(c), 192.281(d), 192.281(e), 192.303)

Question Text *Does the process require plastic pipe joints to be designed and installed in accordance with 192.281?*

Assets Covered 88961 (75)

Result Notes CP 607. Section 7 - uses manufacturers procedures for PE fusion.

Appropriate specifications are listed.

83. Question Result, ID, References **Sat, DC.CO.PLASTICJOINTPROCEDURE.P, 192.273(b) (192.283(a), 192.283(b), 192.283(c), 192.283(d))**  
 Question Text *Does the process require plastic pipe joining procedures to be qualified in accordance with 192.283, prior to making plastic pipe joints?*  
 Assets Covered **88961 (75)**  
 Result Notes **CP 607**
84. Question Result, ID, References **Sat, DC.CO.PLASTICJOINTQUAL.P, 192.285(d) (192.285(a), 192.285(b), 192.285(c), 192.805)**  
 Question Text *Is a process in place to ensure that personnel making joints in plastic pipelines are qualified?*  
 Assets Covered **88961 (75)**  
 Result Notes **CP 607 7.3**
85. Question Result, ID, References **Sat, DC.CO.PLASTICJOINTINSPECTION.P, 192.287 (192.805(h))**  
 Question Text *Is a process in place to assure that persons who inspect joints in plastic pipes are qualified?*  
 Assets Covered **88961 (75)**  
 Result Notes **CP 607 Fusers inspect their own fuses.**
86. Question Result, ID, References **Sat, DC.CO.PLASTICPIPEPROC.P,**  
 Question Text *Do procedures include requirements for storage, handling and installation of plastic pipe, including limits for ultraviolet exposure?*  
 Assets Covered **88961 (75)**  
 Result Notes **OPS 11 section 1**
87. Question Result, ID, References **Sat, DC.CO.PLASTICWEAKLINK.P,**  
 Question Text *Does the manual include procedures for installing a weak link when pulling plastic pipe?*  
 Assets Covered **88961 (75)**  
 Result Notes **OPS 322 section 1.2.4.1**
88. Question Result, ID, References **Sat, DC.CO.PLASTICPIPESEP.P,**  
 Question Text *Does the manual include procedures to ensure minimum separation requirements are met for plastic pipelines?*  
 Assets Covered **88961 (75)**  
 Result Notes **CP 607 section 8.12.4**
89. Question Result, ID, References **NA, DC.CO.PLASTICABOVEGROUND.P,**  
 Question Text *Does the manual include procedures for temporary above ground plastic pipe installation as well as procedures for commission notification for installations longer than thirty days?*  
 Assets Covered **88961 (75)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review. CNG does not do above ground installations on a temporary basis. CNG does plan in incorporating a procedure in the near future once they incorporate their procedures and merge them with MDU.**
90. Question Result, ID, References **Sat, DC.CO.PLASTICBACKFILL.P,**  
 Question Text *Does the manual include procedures to bury plastic pipe with essentially rock-free material or material recommended by the manufacturer?*  
 Assets Covered **88961 (75)**  
 Result Notes **CP 607 section 8.17**
91. Question Result, ID, References **Sat, DC.CO.PLASTICSQUEEZING.P,**  
 Question Text *Does the manual include procedures for restrictions on squeezing of plastic pipe?*  
 Assets Covered **88961 (75)**  
 Result Notes **OPS 309, section 205 and 2.3**

92. Question Result, ID, References **Sat, MO.GM.EQUIPPLASTICJOINT.P, 192.605(b)(1) (192.756)**  
Question Text *Does the process require maintaining equipment used in joining plastic pipe in accordance with the manufacturer's recommended practices or with written procedures that have been proven by test and experience to produce acceptable joints?*  
Assets Covered **88961 (75)**  
Result Notes **CP 501**

## **PRO.SUBICORROSION: Corrosion Control**

93. Question Result, ID, References **Sat, TD.COAT.NEWPIPE.P, 192.605(b)(2) (192.455(a), 192.455(b), 192.455(c), 192.455(d), 192.461(a), 192.461(b), 192.463, 192.483(a))**  
Question Text *Does the process require that each buried or submerged pipeline installed after July 31, 1971 be externally coated with a material that is adequate for underground service on a cathodically protected pipeline?*  
Assets Covered **88961 (75)**  
Result Notes **CP 755 section 7.4**

94. Question Result, ID, References **Sat, TQ.QU.CORROSION.P, 192.453 (192.805(b))**  
Question Text *Does the process require corrosion control procedures to be carried out by, or under the direction of, qualified personnel?*  
Assets Covered **88961 (75)**  
Result Notes **CP 755 section 4. Carried out under the direction of the Manager CP who is qualified in corrosion control methods.**

95. Question Result, ID, References **Sat, TD.COAT.CONVERTPIPE.P, 192.605(b)(2) (192.452(a), 192.455(a), 192.455(b), 192.455(c), 192.455(d), 192.461(a))**  
Question Text *Does the process require that each buried or submerged pipeline that has been converted to gas service and was installed after July 31, 1971, be protected against external corrosion with an adequate coating unless exempted by 192.455(b)?*  
Assets Covered **88961 (75)**  
Result Notes **This probably not applicable but there is a procedural reference in CP 755 section 7.4.**

96. Question Result, ID, References **Sat, TD.CP.POST1971.P, 192.605(b)(2) (192.455(a), 192.457(a), 192.452(a), 192.452(b), 192.455(c), 192.455(d))**  
Question Text *Does the process require that each buried or submerged pipeline installed after July 31, 1971, be 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 **88961 (75)**  
Result Notes **CP 755 section 7.4.**

97. Question Result, ID, References **Sat, TD.CP.PRE1971.P, 192.605(b)(2) (192.457(b))**  
Question Text *Does the process require that pipelines installed before August 1, 1971 (except for cast and ductile iron lines) which are 1) bare or ineffectively coated transmission lines, or 2) bare or coated pipes in compressor, regulator or meter stations, or 3) bare or coated distribution lines, must be cathodically protected in areas where active corrosion is found?*  
Assets Covered **88961 (75)**  
Result Notes **CP 755 section 7.3.**

98. Question Result, ID, References **Sat, TD.CPEXPOSED.EXPOSEINSPECT.P, 192.605(b)(2) (192.459)**  
Question Text *Does the process require that exposed portions of buried pipeline must be examined for external corrosion?*  
Assets Covered **88961 (75)**  
Result Notes **CP 755 section 8.3.1**

99. Question Result, ID, References **Sat, TD.CPEXPOSED.EXPOSECORRODE.P, 192.605(b)(2) (192.459)**  
 Question Text *Does the process require further examination of exposed buried pipe if corrosion is found?*  
 Assets Covered **88961 (75)**  
 Result Notes **CNGs exposed pipe forms document corrosion when found. CNG is in the process of combining their procedures with MDU so that they have multi state procedures in one manual.**
100. Question Result, ID, References **Sat, TD.CPEXPOSED.MONITORCRITERIA.P, 192.605(b)(2) (192.463(a), 192.463(c))**  
 Question Text *Does the process require CP monitoring criteria to be used that is acceptable?*  
 Assets Covered **88961 (75)**  
 Result Notes **CP 755 8.6.1.1**  
  
**CP 755 8.6.1.3.1.1 CNG uses**
101. Question Result, ID, References **Sat, TD.CPMONITOR.TEST.P, 192.605(b)(2) (192.465(a))**  
 Question Text *Does the process adequately describe how to monitor CP that has been applied to pipelines?*  
 Assets Covered **88961 (75)**  
 Result Notes **CP 755 8.6**
102. Question Result, ID, References **Sat, TD.CPMONITOR.CURRENTTEST.P, 192.605(b)(2) (192.465(b))**  
 Question Text *Does the process give sufficient details for making electrical checks of rectifiers or impressed current sources?*  
 Assets Covered **88961 (75)**  
 Result Notes **CP 8.6.2.1**
103. Question Result, ID, References **Sat, TD.CPMONITOR.REVCURRENTTEST.P, 192.605(b)(2) (192.465(c))**  
 Question Text *Does the process give sufficient details for making electrical checks of interference bonds, diodes, and reverse current switches?*  
 Assets Covered **88961 (75)**  
 Result Notes **CP 755 8**
104. Question Result, ID, References **Sat, TD.CPMONITOR.DEFICIENCY.P, 192.605(b)(2) (192.465(d))**  
 Question Text *Does the process require that the operator promptly correct any identified deficiencies in corrosion control?*  
 Assets Covered **88961 (75)**  
 Result Notes **CP 755 section 8**
105. Question Result, ID, References **NA, TD.CP.UNPROTECT.P, 192.605(b)(2) (192.465(e))**  
 Question Text *Does the process give sufficient direction for the monitoring of external corrosion on buried pipelines that are not protected by cathodic protection?*  
 Assets Covered **88961 (75)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review. All facilities in WA are cathodically protected.**
106. Question Result, ID, References **Sat, FS.FG.CASING.P,**  
 Question Text *Does the manual include procedures to only install bare steel casings and to include test leads on all new casings?*  
 Assets Covered **88961 (75)**  
 Result Notes **CP 755 section must install test leads after 1992**  
  
**CP 605 - may only use bare pipe**
107. Question Result, ID, References **Sat, FS.FG.CASESEAL.P,**



Question Text *Does the manual include procedures to seal the ends of casings and conduits for mains and transmission and to seal the end nearest a building for service lines?*

Assets Covered 88961 (75)

Result Notes CP 605 8.6.8.1 for mains

CP 607 8.13.5.2.2 for services

108. Question Result, ID, Sat, TD.CP.ELECISOLATE.P, 192.605(b)(2) (192.467(a), 192.467(b), 192.467(c), 192.467(d),  
References 192.467(e))

Question Text *Does the process give adequate guidance for electrically isolating 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 88961 (75)

Result Notes CP 755 8.1.2

109. Question Result, ID, Sat, TD.CP.CASINGINSPECT.P,  
References

Question Text *Does the process give sufficient direction for conducting annual casing inspections to ensure electrical isolation from the pipeline?*

Assets Covered 88961 (75)

Result Notes CP 755 8.6.3.1

CNG uses -0.73v to determine if a casing is potentially shorted.

110. Question Result, ID, Sat, TD.CP.MONITOR.TESTSTATION.P, 192.469  
References

Question Text *Does the process contain provisions to assure that each pipeline has sufficient test stations or other contact points to determine the adequacy of cathodic protection?*

Assets Covered 88961 (75)

Result Notes CP 755 8.6.1.2

111. Question Result, ID, Sat, TD.CP.MONITOR.TESTLEAD.P, 192.605(b)(2) (192.471(a), 192.471(b), 192.471(c))  
References

Question Text *Does the process provide adequate instructions for the installation of test leads?*

Assets Covered 88961 (75)

Result Notes CP 761 section 8.4

112. Question Result, ID, Sat, TD.CP.MONITOR.INTFRCURRENT.P, 192.605(b)(2) (192.473(a))  
References

Question Text *Does the operator have a program in place to minimize detrimental effects of interference currents on its pipeline system and does the process for designing and installing cathodic protection systems provide for the minimization of detrimental effects of interference currents on existing adjacent metallic structures?*

Assets Covered 88961 (75)

Result Notes CP 755 section 8.5

113. Question Result, ID, Sat, TD.ICP.CORRGAS.P, 192.605(b)(2) (192.475(a))  
References

Question Text *Does the process require that the corrosive effect of the gas in the pipeline be investigated and if determined to be corrosive, steps be taken to minimize internal corrosion?*

Assets Covered 88961 (75)

Result Notes CNG does not transport corrosive gas.

CP 755 8.3.6 has a procedure for internal corrosion.

114. Question Result, ID, Sat, TD.ICP.EXAMINE.P, 192.605(b)(2) (192.475(a), 192.475(b))  
References

Question Text *Does the process direct personnel to examine removed pipe for evidence of internal corrosion?*

Assets Covered 88961 (75)

Result Notes CP 755 8.3.6

115. Question Result, ID, References **Sat, TD.ICP.CORRGASACTION.P, 192.605(b)(2) (192.477)**  
 Question Text *Does the process give adequate direction for actions to be taken if corrosive gas is being transported by pipeline?*  
 Assets Covered **88961 (75)**  
 Result Notes **CNG's gas control monitors gas to ensure no corrosive gas is being transported.**
116. Question Result, ID, References **Sat, TD.ATM.ATMCORRODE.P, 192.605(b)(2) (192.479(a), 192.479(b), 192.479(c))**  
 Question Text *Does the process give adequate guidance identifying atmospheric corrosion and for protecting above ground pipe from atmospheric corrosion?*  
 Assets Covered **88961 (75)**  
 Result Notes **CP 754 8.1.1**  
  
**OPS 619 includes repair frequencies depending on the AC grade. (good, fair, poor)**
117. Question Result, ID, References **Sat, TD.ATM.ATMCORRODEINS.P, 192.605(b)(2) (192.481(a), 192.481(b), 192.481(c))**  
 Question Text *Does the process give adequate instruction for the inspection of aboveground pipeline segments, including inside meter and pressure regulator installations, for atmospheric corrosion?*  
 Assets Covered **88961 (75)**  
 Result Notes **CP 754**
118. Question Result, ID, References **Sat, AR.RCOM.REPAIR.P, 192.605(b)(2) (192.485(a), 192.485(b), 192.487(a), 192.487(b), 192.489(a), 192.489(b), 192.491(c))**  
 Question Text *Does the process give sufficient guidance for personnel to repair or replace pipe that has corroded to an extent that there is no longer sufficient remaining strength in the pipe wall?*  
 Assets Covered **88961 (75)**  
 Result Notes **CP 755 8.4.3 for distribution**  
  
**CP 755 8.4.2 for transmission RSTRENG and B31G**
119. Question Result, ID, References **Sat, TD.CP.RECORDS.P, 192.605(b)(2) (192.491(a), 192.491(b), 192.491(c))**  
 Question Text *Does the process include records requirements for the corrosion control activities listed in 192.491?*  
 Assets Covered **88961 (75)**  
 Result Notes **CP 755 section 5 has a records retention requirement based on form numbers.**

## **MISCTOPICS.PUBAWARE: Public Awareness Program Effectiveness**

120. Question Result, ID, References **Sat, PD.PA.MSTRMETER.P, 192.616(j) (192.616(h))** (also presented in: PRO.SUBLPUBAWARE)  
 Question Text *Does the public awareness program for a master meter or petroleum gas system meet the requirements of Part 192?*  
 Assets Covered **88961 (75)**  
 Result Notes **Master meters twice per year.**

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*Report Parameters: Results: all*

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