

# Inspection Output (IOR)

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## Report Filters

Assets All, and including items not linked to any asset.

Results All

## Inspection Information

Inspection Name	8580 CNGC DIMP - WA Intrastate	Operator(s)	CASCADE NATURAL GAS CORP (2128) Lead Derek Norwood	Plan Submitted	11/27/2023
Status	STARTED	Team Members	David Cullom, Lex Vinsel, Anthony Dorrough, Scott Anderson, Tom Green, Jason Hoxit	Plan Approval	--
Start Year	2023	Observer(s)	John Trier, Marina Rathbun	All Activity Start	11/13/2023
System Type	GD	Supervisor	Dennis Ritter	All Activity End	11/13/2023
Protocol Set ID	WA.GD.2023.01	Director	Scott Rukke	Inspection Submitted	--
				Inspection Approval	--

## Inspection Summary

### Inspection Scope and Summary

The inspection conducted was Distribution Integrity Management Program inspection. The inspection included review of Cascade Natural Gas procedures and associated records from 2020 through October 2023. Procedures reviewed were OPS 1000 and all appendices.

### Facilities visited and Total AFOD

Inspection conducted remotely via MS Teams on Nov 13, 2023

1 AFOD

### Summary of Significant Findings

(DO NOT Discuss Enforcement options)

There were no probable violations or areas of concern as a result of this inspection.

### Primary Operator contacts and/or participants

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### Operator executive contact and mailing address for any official correspondence

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## Scope (Assets)

Short # Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	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	81	81	81	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)	--	GDIM	P, R, O, S	Detail	--

## Plan Implementations

Activity #	SMART Name	Act#	Start Date	End Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Inspected	Total	Required % Complete
1.	DIMP	--	11/13/2023	11/13/2023	--	all planned questions	all assets	all types	81	81	81	81	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	DIMP 1	COMPLETED	11/27/2023	DIMP	88961 (75)

## Results (all values, 81 results)

### GDIM.PM: Preventive and Mitigative Actions

- Question Result, ID, References [Sat, GDIM.PM.IDENTIFYMEASURES.P, 192.1007\(d\)](#)

Question Text *Does the plan include procedures to identify when measures, beyond minimum code requirements specified outside of Part 192 Subpart P, are required to reduce risk?*

Assets Covered [88961 \(75\)](#)

Result Notes [OPS 1000 Section 5](#)
- Question Result, ID, References [Sat, GDIM.PM.IDENTIFYMEASURES.R, 192.1007\(d\)](#)

Question Text *When measures, beyond minimum code requirements specified outside of Part 192 Subpart P, are required to reduce risk, does the plan identify the measures selected, how they will be implemented, and the risks they are addressing?*

Assets Covered [88961 \(75\)](#)

Result Notes [Appendix F Accelerated Actions](#)

[Early Vintage Steel Pipe identified as accelerated action in 2021, replaced through SSIP program based on relative risk](#)

[No other actions identified since](#)
- Question Result, ID, References [Sat, GDIM.PM.LEAKMANAGEMENT.P, 192.1007\(d\)](#)

Question Text *Does the plan include an effective leak management program (unless all leaks are repaired when found)?*

Assets Covered [88961 \(75\)](#)

Result Notes [OPS 1000 Section 5.2.2](#)
- Question Result, ID, References [Sat, GDIM.PM.IMPLEMENTPM.R, 192.1007\(d\)](#)

Question Text *Do records demonstrate implementation of the measures, required by Part 192 Subpart P, to reduce risk?*

Assets Covered 88961 (75)

Result Notes Reviewed EVSP replacement plan, approximately 23% has been replaced since 2020

## GDIM.IM: Plan Implementation

5. Question Result, ID, References Sat, GDIM.QA.PLANIMPLEMENT.P, 192.1005

Question Text *Was the plan written and implemented per the requirement of 192.1005 by 08/02/2011?*

Assets Covered 88961 (75)

Result Notes Revision log has implementation date of 8/1/2011

OPS 1000

6. Question Result, ID, References Sat, GDIM.RA.SOURCES.P, 192.1007(a)(1)

Question Text *Do the procedures identify or reference the appropriate sources used to determine certain characteristics (e.g., Design, Operating Conditions, Operating Environmental Factors) necessary to assess the threats and risks to the pipeline?*

Assets Covered 88961 (75)

Result Notes OPS 1000 Section 2

## GDIM.KN: Knowledge of the System

7. Question Result, ID, References Sat, GDIM.RA.INFORMATION.P, 192.1007(a)(2)

Question Text *Do the procedures require the consideration of information gained from past design, operations, and maintenance (e.g., O&M activities, field surveys, One-Call system information, excavation damage, etc.)?*

Assets Covered 88961 (75)

Result Notes OPS 1000 Section 2.2 and 2.3

8. Question Result, ID, References Sat, GDIM.RA.GAPS.P, 192.1007(a)(3)

Question Text *Does the plan contain procedures to identify additional information that is needed to fill gaps due to missing, inaccurate, or incomplete records?*

Assets Covered 88961 (75)

Result Notes OPS 1000 Section 2.6.1

9. Question Result, ID, References Sat, GDIM.RA.INFONEEDS.P, 192.1007(a)(3)

Question Text *Do the procedures specify the means to collect the additional information needed to fill gaps due to missing, inaccurate, or incomplete records (e.g., O&M activities, field surveys, One-Call System, etc.)?*

Assets Covered 88961 (75)

Result Notes OPS 1000 Section 2.6.1 and 2.6.2

10. Question Result, ID, References Sat, GDIM.RA.INFONEEDS.R, 192.1007(a)(3)

Question Text *Does the plan list the additional information needed to fill gaps due to missing, inaccurate, or incomplete records?*

Assets Covered 88961 (75)

Result Notes Appendix B Knowledge of System

Cross Bores, MAOP Validation (Missing Records), Braised Service

Appendix D has a primary threat category for Missing Data to rank risk

Appendix F Accelerated Actions

GIS Cleanup

11. Question Result, ID, References **Sat, GDIM.RA.NEWPIPEDATA.P, 192.1007(a)(5)**  
 Question Text *Do the procedures require the capture and retention of data on any new pipeline installed?*  
 Assets Covered **88961 (75)**  
 Result Notes **OPS 1000 Section 2.5**
12. Question Result, ID, References **Sat, GDIM.RA.NEWPIPEDATA.R, 192.1007(a)(5)**  
 Question Text *Does the data required for capture and retention include, at a minimum, the location where the new pipeline is installed and the material from which it is constructed?*  
 Assets Covered **88961 (75)**  
 Result Notes **Reviewed a sample of records from CNG GIS**
- All lines include install date and material type**
- Link to as-built**
13. Question Result, ID, References **Sat, GDIM.RA.DEMOKNOWLEDGE.R, 192.1007(a)**  
 Question Text *Do records demonstrate implementation of the element "Knowledge of the System"?*  
 Assets Covered **88961 (75)**  
 Result Notes **Reviewed data in Appendix D which identifies primary and sub threats by line**
14. Question Result, ID, References **Sat, GDIM.RA.DEMOUNDERSTANDING.R, 192.1007(a)**  
 Question Text *Has the operator demonstrated an adequate understanding of the system?*  
 Assets Covered **88961 (75)**  
 Result Notes **CNG has data available in GIS and As-builts**
- For missing data they have a process to collect the data**

## GDIM.TH: Identify Threats

15. Question Result, ID, References **Sat, GDIM.RA.INFOCONSIDERED.P, 192.1007(b)**  
 Question Text *Did the operator consider the information that was reasonably available to identify existing and potential threats?*  
 Assets Covered **88961 (75)**  
 Result Notes **OPS 1000 Section 3**
16. Question Result, ID, References **Sat, GDIM.RA.INFOCONSIDERED.R, 192.1007(b)**  
 Question Text *In identifying threats did the information considered include all of the required data and information sources?*  
 Assets Covered **88961 (75)**  
 Result Notes **Information gathered in field and incorporated into risk ranking**
- Appendix D identifies all threats and consequences and has a ranking for each**
17. Question Result, ID, References **Sat, GDIM.RA.OUTSIDESOURCES.P, 192.1007(b)**  
 Question Text *Do the procedures consider, in addition to the operator's own information, data from external sources (e.g. trade associations, government agencies, or other system operators, etc.) to assist in identifying potential threats?*  
 Assets Covered **88961 (75)**  
 Result Notes **OPS 1000 Section 3.4.1**
18. Question Result, ID, References **Sat, GDIM.RA.THREATCATEGORIES.P, 192.1007(b)**  
 Question Text *In identifying threats, do the procedures include consideration of all of the required threat categories to each gas distribution pipeline?*

Assets Covered 88961 (75)  
Result Notes OPS 1000 Section 3.2

19. Question Result, ID, References Sat, GDIM.RA.IMPLEMENTTH.R, 192.1007(b)  
Question Text *Do records demonstrate implementation of the element "Identify Threats"?*  
Assets Covered 88961 (75)  
Result Notes Information gathered in field and incorporated into risk ranking

Appendix D identifies all threats and consequences and has a ranking for each

## GDIM.RR: Evaluate and Rank Risk

20. Question Result, ID, References Sat, GDIM.RA.RISKRANKING.P, 192.1007(c)  
Question Text *Do the procedures contain the method(s) and/or a model used to determine the relative importance of each threat and estimate and rank the risks posed?*  
Assets Covered 88961 (75)  
Result Notes OPS 1000 Section 4

Appendix D

Appendix E

21. Question Result, ID, References Sat, GDIM.RA.THREATSCONSIDERED.P, 192.1007(c)  
Question Text *Do the procedures to evaluate and rank risk consider each applicable current and potential threat?*  
Assets Covered 88961 (75)  
Result Notes Appendix D Table D3.1

22. Question Result, ID, References Sat, GDIM.RA.LIKELIHOOD.P, 192.1007(c)  
Question Text *Do the procedures to evaluate and rank risk consider the likelihood of failure associated with each threat?*  
Assets Covered 88961 (75)  
Result Notes OPS 1000 Section 4.2.6

23. Question Result, ID, References Sat, GDIM.RA.CONSEQUENCE.P, 192.1007(c)  
Question Text *Do the procedures to evaluate and rank risk consider the potential consequence of failure for all applicable threats?*  
Assets Covered 88961 (75)  
Result Notes OPS 1000 Section 4.2.6

24. Question Result, ID, References Sat, GDIM.RA.SUBDIVIDE.R, 192.1007(c)  
Question Text *If subdivision of system occurs, does the plan subdivide the system into regions with similar characteristics and for which similar actions are likely to be effective in reducing risk?*  
Assets Covered 88961 (75)  
Result Notes Cascade does not subdivide the system

Look at entire system through the same lens

25. Question Result, ID, References Sat, GDIM.RA.RESULTS.R, 192.1007(c)  
Question Text *Are the results of the risk ranking supported by the risk evaluation model/method?*  
Assets Covered 88961 (75)  
Result Notes Appendix E ranks risks in a relevant ranking for washington and oregon

Risk is calculated based on likelihood and consequence and CNG calculates risk per foot of pipe to complete the risk ranking

26. Question Result, ID, References Sat, GDIM.RA.RESULTSVALIDATION.R, 192.1007(c)

Question Text *Did the operator validate the results generated by the risk evaluation model/method?*

Assets Covered 88961 (75)

Result Notes DIMP model is run in May every year

Integrity team completes validation every year and will periodically perform spot checks of the data

Data is trended over 5 years to identify which segments are increasing/decreasing and why

Table E5.1 is the summary of validation reports for the year

27. Question Result, ID, References Sat, GDIM.RA.IMPLEMENTRR.R, 192.1007(c)

Question Text *Do records demonstrate implementation of the element "Evaluate and Rank Risk"?*

Assets Covered 88961 (75)

Result Notes Appendix E ranks risks in a relevant ranking for washington and oregon

Risk is calculated based on likelihood and consequence and CNG calculates risk per foot of pipe to complete the risk ranking

DIMP model is run in May every year

Integrity team completes validation every year and will periodically perform spot checks of the data

Data is trended over 5 years to identify which segments are increasing/decreasing and why

Table E5.1 is the summary of validation reports for the year

## GDIM.EV: Measure Performance and Evaluate Effectiveness

28. Question Result, ID, References Sat, GDIM.QA.PERFMEASUREBASELINE.P, 192.1007(e)

Question Text *Does the plan contain procedures for how the operator established a baseline for each performance measure?*

Assets Covered 88961 (75)

Result Notes OPS 1000 Section 6.2

29. Question Result, ID, References Sat, GDIM.QA.PERFMEASUREBASELINE.R, 192.1007(e)

Question Text *Does the plan establish a baseline for each performance measure?*

Assets Covered 88961 (75)

Result Notes Data provided in Appendix H

Along with federal required data, CNG tracks mechanical fitting failures as required by WA

30. Question Result, ID, References Sat, GDIM.QA.PERFMEASUREDATA.P, 192.1007(e)

Question Text *Does the operator have procedures to collect the data for each performance measure?*

Assets Covered 88961 (75)

Result Notes OPS 1000 Section 6.4

31. Question Result, ID, References Sat, GDIM.QA.PERFMEASUREMONITOR.P, 192.1007(e)

Question Text *Do the procedures require the operator to monitor each performance measure?*

Assets Covered 88961 (75)

Result Notes OPS 1000 Section 6.5

32. Question Result, ID, References Sat, GDIM.QA.MEASUREEFFECTIVENESS.P, 192.1007(e)

Question Text *When measures are required to reduce risk, does the plan provide/describe what type and/or what specific performance measures will be used to measure effectiveness?*

Assets Covered 88961 (75)

Result Notes OPS 1000 Section 6.5.1 and 6.5.2

33. Question Result, ID, References Sat, GDIM.QA.IMPLEMENTEV.R, 192.1007(e)

Question Text *Do records demonstrate implementation of the element "Measure Performance, Monitor Results, and Evaluate Effectiveness"?*

Assets Covered 88961 (75)

Result Notes Data provided in Appendix H

Along with federal required data, CNG tracks mechanical fitting failures as required by WA

## GDIM.PE: Periodic Evaluation

34. Question Result, ID, References Sat, GDIM.CA.PERIODICEVAL.P, 192.1007(f)

Question Text *Do the procedures for periodic evaluation include all of the requirements of §192.1007(f)?*

Assets Covered 88961 (75)

Result Notes OPS 1000 Section 7

35. Question Result, ID, References Sat, GDIM.CA.PERIODICEVAL.R, 192.1007(f)

Question Text *Do records demonstrate implementation of the element "Periodic Evaluation and Improvement"?*

Assets Covered 88961 (75)

Result Notes OPS 1000 reviewed and updated once every 5 years, completed in 2016 and 2021

Appendices are updated annually to include new data from prior year

Form 21761 DIMP Review Summary for five year and annual appendix revision

## GDIM.RP: Reporting

36. Question Result, ID, References Sat, GDIM.RR.ANNUALREPORT.P, 192.1007(g)

Question Text *Does the plan contain or reference procedures for reporting, on an annual basis, the four measures listed in 192.1007(e)(1)(i) through (e)(1)(iv) to PHMSA as part of the annual report required by 191.11 and the State regulatory authority?*

Assets Covered 88961 (75)

Result Notes OPS 1000 Section 8

37. Question Result, ID, References Sat, GDIM.RR.SUBMITREPORTS.R, 192.1007(g)

Question Text *Has the operator submitted the required reports?*

Assets Covered 88961 (75)

Result Notes Annual reports submitted by March 15

Reviewed records for 2020-2022

## GDIM.RC: Records Required to be Kept

38. Question Result, ID, References Sat, GDIM.QA.RECORDREQUIREMENTS.P, 192.1011

Question Text *Are there procedures specifying which records demonstrating compliance with Subpart P will be maintained for at least 10 years?*

Assets Covered 88961 (75)

Result Notes OPS 1000 Section 9.1

39. Question Result, ID, References **Sat, GDIM.QA.PLANRETENTION.P, 192.1011**  
 Question Text *Are there procedures specifying that copies of superseded integrity management plans will be maintained for at least 10 years?*  
 Assets Covered **88961 (75)**  
 Result Notes **OPS 1000 Section 9.1**
40. Question Result, ID, References **Sat, GDIM.QA.RECORDREQUIREMENTS.R, 192.1011**  
 Question Text *Has the operator maintained the required records?*  
 Assets Covered **88961 (75)**  
 Result Notes **Reviewed a sample of leaks from >10 years old. All existing leaks and historical leaks are mapped**  
  
**Prior versions of the DIMP Plan are maintained for 10 years**  
  
**Appendix H shows data from prior years**

## **GDIM.IMPL: GDIM Implementation**

41. Question Result, ID, References **NA, GDIM.QA.ISSUESIMPL.R, 192.1005**  
 Question Text *Have all issues raised in previous DIMP inspections been satisfactorily addressed?*  
 Assets Covered **88961 (75)**  
 Result Notes **No concerns or violations on previous DIMP inspection 2020**
42. Question Result, ID, References **Sat, GDIM.RA.OUTSIDESOURCESIMPL.R, 192.1007(b)**  
 Question Text *Has the operator identified information or data from external sources (e.g. trade associations, operator's consultants, government agencies, other operators, manufacturers, etc.) that may require re-evaluation of threats and risks?*  
 Assets Covered **88961 (75)**  
 Result Notes **Flood zones from FEMA used, USDA wildfires, USGS for slide data, etc.**  
  
**Advisory bulletins from PHMSA (Mechanical fittings, vandalism, flooding etc.)**
43. Question Result, ID, References **Sat, GDIM.RA.GAPSIMPL.R, 192.1007(a)(3)**  
 Question Text *Is missing or incomplete system information and data needed to fill knowledge gaps to assess existing and potential threats being collected?*  
 Assets Covered **88961 (75)**  
 Result Notes **GIS cleanup accelerated action identified, unknown assets have decreased by ~11% since 2020**
44. Question Result, ID, References **Sat, GDIM.RA.SYSINFONEEDSIMPL.R, 192.1007(a)(3)**  
 Question Text *Is missing or incomplete system information and data using the procedures prescribed in the DIMP plan being collected?*  
 Assets Covered **88961 (75)**  
 Result Notes **GIS cleanup accelerated action identified, unknown assets have decreased by ~11% since 2020**  
  
**Any employee can submit map update request based on inaccurate information**
45. Question Result, ID, References **Sat, GDIM.RA.OMINFONEEDSIMPL.R, 192.1007(a)(3)**  
 Question Text *Has any new or missing information identified or acquired during normal operations, maintenance, and inspection activities been incorporated into the DIMP plan?*  
 Assets Covered **88961 (75)**  
 Result Notes **Reviewed an example as-built correction form submitted to update records and maps**  
  
**GSD-4619 Update Main Attributes based on new pressure test**



Updates can also be submitted during leak survey or other O&M tasks

46. Question Result, ID, References **Sat, GDIM.RA.NEWPIPEIMPL.R, 192.1007(a)(5)**  
Question Text *Have required data on any new pipeline installations since August 2, 2011 been captured (e.g., location, wall thickness/SDR, manufacturer, lot/production number)?*  
Assets Covered **88961 (75)**  
Result Notes **OPS 1000 Section 2.2**

Reviewed a sample of GIS and As-Built data

47. Question Result, ID, References **Sat, GDIM.RA.DATAFORMIMPL.R, 192.1007(a)**  
Question Text *Are data collection forms used in conjunction with the operator's DIMP plan being fully and accurately completed?*  
Assets Covered **88961 (75)**  
Result Notes **Reviewed as-builts and maintenance forms that are input into the DIMP Model**

New construction as-builts document cross bore information to ensure field personnel are cognizant of risk of cross

Review CNG 293 forms

Leak investigation record

48. Question Result, ID, References **Sat, GDIM.RA.SMEIMPL.R, 192.1007(a)**  
Question Text *If Subject Matter Experts (SMEs), is their documented knowledge and experience being appropriately used in the DIMP Program?*  
Assets Covered **88961 (75)**  
Result Notes **OPS 1000 Section 1.4**

CNG uses isolated SME or an SME Panel for weighting various threat ranking

Last SME Panel meeting was in 2018

Reviewed a sample of SME Bios at CNG

49. Question Result, ID, References **NA, GDIM.RA.DEMOUNDERSTANDINGIMPL.O, 192.1007(a)**  
Question Text *Do operator personnel in the field understand their responsibilities under the DIMP plan?*  
Assets Covered **88961 (75)**  
Result Notes **No such activity/condition was observed during the inspection.**

50. Question Result, ID, References **Sat, GDIM.RA.THREATCATEGORIESIMPL.R, 192.1007(b)**  
Question Text *Has the operator acquired any new information relevant to system knowledge that may affect its threat identification?*  
Assets Covered **88961 (75)**  
Result Notes **Appendix C Table C4.1**

Potential threat review

Probabilistic Data gathered for identifying cross bores but has not been implemented yet due to high cost

51. Question Result, ID, References **Sat, GDIM.RA.INFOCONSIDEREDIMPL.R, 192.1007(b)**  
Question Text *Have any changes occurred that require re-evaluation of threats and risks?*  
Assets Covered **88961 (75)**  
Result Notes **If new threat is identified from potential threat list then it is incorporated into Appendix D for existing threats**

52. Question Result, ID, References **Sat, GDIM.RA.IMPLEMENTTHUPDATEIMPL.R, 192.1007(c)**  
 Question Text *Since the last DIMP plan review by the regulatory agency, has the threat identification and risk assessment been updated based on newly acquired information or data relevant to system knowledge?*  
 Assets Covered **88961 (75)**  
 Result Notes **No new threats identified since last inspection in 2020**
- Last revision was in 2018 but only included minor revision to threat weighting**
53. Question Result, ID, References **Sat, GDIM.RA.IMPLEMENTTHUPDATEPLANIMPL.R, 192.1007(c)**  
 Question Text *If the threat identification and risk evaluation and ranking have been modified, were the revisions made in accordance with the procedure in the DIMP plan?*  
 Assets Covered **88961 (75)**  
 Result Notes **No new threats identified since last inspection in 2020**
- Last revision was in 2018 but only included minor revision to threat weighting**
- If changes were made it would be documented on Form 21761 and Table I3.1 in Appendix I**
54. Question Result, ID, References **NA, GDIM.RA.SUBDIVIDEADEQIMPL.R, 192.1007(c)**  
 Question Text *Does the current subdivision process (grouping of materials, geographic areas, etc.) adequately meet the need to properly evaluate and rank the existing and potential threats to the integrity of the system?*  
 Assets Covered **88961 (75)**  
 Result Notes **MDU does not subdivide their system**
- OPS 100 Section 4.1**
55. Question Result, ID, References **NA, GDIM.RA.SUBDIVIDEUPDATEIMPL.R, 192.1007(c)**  
 Question Text *Have the system subdivisions within the risk evaluation and ranking been added to or modified since the last plan review by the regulatory agency?*  
 Assets Covered **88961 (75)**  
 Result Notes **MDU does not subdivide their system**
- OPS 100 Section 4.1**
56. Question Result, ID, References **NA, GDIM.RA.SUBDIVIDEDIMPIMPL.R, 192.1007(c)**  
 Question Text *If system subdivisions have been added or modified, was it done in accordance with the procedures described in the DIMP plan?*  
 Assets Covered **88961 (75)**  
 Result Notes **MDU does not subdivide their system**
- OPS 100 Section 4.1**
57. Question Result, ID, References **NA, GDIM.RA.SUBDIVIDERESULTIMPL.R, 192.1007(c)**  
 Question Text *If system subdivisions have been added or modified, did the new system subdivision result in modifications to the risk evaluation and ranking?*  
 Assets Covered **88961 (75)**  
 Result Notes **MDU does not subdivide their system**
- OPS 100 Section 4.1**
58. Question Result, ID, References **Sat, GDIM.PM.IMPLEMENTPMIMPL.R, 192.1007(d)**  
 Question Text *Does documentation reviewed demonstrate that measures to reduce risks per the DIMP plan are being implemented?*  
 Assets Covered **88961 (75)**

Result Notes Annual review of appendices and accelerated actions

Accelerated Actions include EVSP, GIS Cleanup, Excavation Damage Outreach

59. Question Result, ID, References Sat, GDIM.PM.IMPLEMENTPMCOMPLETEIMPL.R, 192.1007(d)  
Question Text *Have any measures to reduce risks resulting in the elimination/mitigation of the associated identified threat been completed (e.g., pipe replacement program completed, etc.)?*  
Assets Covered 88961 (75)  
Result Notes Anacortes Pipe Replacement completed in 2020  
  
Since then MDU has gone to EVSP replacement instead of city or district replacement plans so no other replacements have been fully completed
60. Question Result, ID, References Sat, GDIM.PM.IMPLEMENTPMREEVALIMPL.R, 192.1007(d)  
Question Text *Have risks been re-evaluated and re-ranked because of the elimination/mitigation of an identified threat?*  
Assets Covered 88961 (75)  
Result Notes No threats have been eliminated but CNG has data showing that risk is decreasing
61. Question Result, ID, References Sat, GDIM.PM.IMPLEMENTPMSPECIFRISKIMPL.R, 192.1007(d)  
Question Text *Does each implemented risk reduction measure identified in the DIMP plan address a specific risk or group of risks?*  
Assets Covered 88961 (75)  
Result Notes Accelerated Actions include EVSP replacement, GIS Cleanup, Excavation Damage Outreach
62. Question Result, ID, References Sat, GDIM.PM.LEAKMANAGEMENTIMPL.R, 192.1007(d)  
Question Text *Can the operator provide documentation to demonstrate that an effective leak management program is being implemented (answer "N/A" if all leaks are repaired when found)?*  
Assets Covered 88961 (75)  
Result Notes OPS 617 identifies leak grading criteria and repair timeline
63. Question Result, ID, References Sat, GDIM.QA.IMPLEMENTEVDATAIMPL.R, 192.1007(e)  
Question Text *Is data being collected for the required performance measures in 192.1007(e)?*  
Assets Covered 88961 (75)  
Result Notes Appendix H includes all required data and additional performance measures identified by CNG including Weighted Average Risk (WAR)
64. Question Result, ID, References Sat, GDIM.QA.IMPLEMENTEVDATADIMPIMPL.R, 192.1007(e)  
Question Text *Based on field observations and/or record reviews, is the data used to measure performance being accurately collected in accordance with the procedures in its DIMP plan?*  
Assets Covered 88961 (75)  
Result Notes Data provided in Appendix H  
  
Along with federal required data, CNG tracks mechanical fitting failures as required by WA
65. Question Result, ID, References Sat, GDIM.QA.IMPLEMENTEVBASELINEIMPL.R, 192.1007(e)  
Question Text *Is each performance measure being monitored from an established baseline?*  
Assets Covered 88961 (75)  
Result Notes Each performance measure has an establish baseline, rolling 5 year average  
  
If current year has >25% increase above baseline then CNG will evaluate and perform accelerated actions if necessary
66. Question Result, ID, References Sat, GDIM.QA.IMPLEMENTEVRISKIMPL.R, 192.1007(e)

Question Text *Is each performance measure added since the DIMP plan was last updated tied to a specific risk reduction measure or group of measures?*

Assets Covered 88961 (75)

Result Notes Appendix H data includes performance measures and are tied to reducing various threats

Appendix F identifies accelerated actions which are tied to a specific threat or group of threats

67. Question Result, ID, References Sat, GDIM.CA.PERIODICEVALFREQIMPL.R, 192.1007(f)

Question Text *Have periodic evaluations of the DIMP plan been performed on the frequency specified in the plan? [If a periodic evaluation has not been required since plan implementation or the last inspection, mark questions 27-32 as "N/A".]*

Assets Covered 88961 (75)

Result Notes Five year evaluation completed in 2016 and 2021

Annual review completed for appendices

68. Question Result, ID, References Sat, GDIM.CA.PERIODICEVALREQTSIMPL.R, 192.1007(f)

Question Text *Did the periodic evaluation include all required elements?*

Assets Covered 88961 (75)

Result Notes Reviewed OPSMOC page for 5 year review, changes included changing the DIMP model re-run date to May in order to capture construction work that had been completed at the end of the prior year, change references to unified MDUG

69. Question Result, ID, References Sat, GDIM.CA.PERIODICEVALHIRISKIMPL.R, 192.1007(f) (192.1007(e))

Question Text *If any established performance measures indicated an increase in risk beyond an acceptable level (as established in the DIMP plan), were new risk reduction measures implemented along with their associated performance measures?*

Assets Covered 88961 (75)

Result Notes No performance measures indicated an increase in risk beyond an acceptable level that would require additional actions

70. Question Result, ID, References Sat, GDIM.CA.PERIODICEVALRISKREDIMPL.R, 192.1007(f)

Question Text *If the periodic evaluation indicates that implemented measures to reduce risks are NOT effective, were risk reduction measures modified, deleted or added?*

Assets Covered 88961 (75)

Result Notes Damages per 1000 locates dipped in 2021 but then returned to normal in 2022 so the data showed a large jump year-to-year

CNG will continue the program to ensure the downward trend continues or if new actions are needed

71. Question Result, ID, References Sat, GDIM.CA.PERIODICEVALPRFMESIMPL.R, 192.1007(f)

Question Text *Did the periodic evaluation indicate that the selected performance measures are assessing the effectiveness of risk reduction measures, and, if not, were performance measures modified, deleted or added?*

Assets Covered 88961 (75)

Result Notes Annual review completed for additional actions and performance measures, based on data CNG identifies if the action is effective

72. Question Result, ID, References Sat, GDIM.CA.PERIODICEVALDIMPIMPL.R, 192.1007(f)

Question Text *Were procedures followed in conducting periodic evaluations and program improvements?*

Assets Covered 88961 (75)

73. Question Result, ID, References Sat, GDIM.RR.SUBMITREPORTSIMPL.R, 192.1007(g)

Question Text *Were Parts C and D of the PHMSA Distribution Annual Report (Form 7100.1-1) completed in the submission to PHMSA and the state regulatory authority having jurisdiction, if required, for each year since the last inspection?*

Assets Covered 88961 (75)  
Result Notes Parts C and D data are accurate and complete

74. Question Result, ID, References Sat, GDIM.QA.RECORDREQUIREMENTSIMPL.R, 192.1011  
Question Text *Are records retained demonstrating compliance with Subpart P, as specified in its DIMP plan, for 10 years (or since 08/02/2011)?*

Assets Covered 88961 (75)  
Result Notes Reviewed a sample of leaks from >10 years old. All existing leaks and historical leaks are mapped  
  
Prior versions of the DIMP Plan are maintained for 10 years  
  
Appendix H shows data from prior years

75. Question Result, ID, References Sat, GDIM.QA.RECORDREQTSRETAINIMPL.R, 192.1011  
Question Text *Were copies of superseded DIMP plans retained for 10 years (or since 08/02/2011)?*

Assets Covered 88961 (75)  
Result Notes Reviewed a sample of leaks from >10 years old. All existing leaks and historical leaks are mapped  
  
Prior versions of the DIMP Plan are maintained for 10 years  
  
Appendix H shows data from prior years

76. Question Result, ID, References Sat, GDIM.QA.RECORDREQTSDIMPIMPL.R, 192.1011  
Question Text *Were DIMP procedures followed as applicable to records retention?*

Assets Covered 88961 (75)  
Result Notes OPS 1000 Section 9  
  
Records stored in Sharepoint

77. Question Result, ID, References NA, GDIM.PI.PERIODICINSPDEVAPPRVIMPL.R, 192.1013(c)  
Question Text *Has approval been requested or received from PHMSA or the appropriate State Regulatory Authority for alternate (less strict than code) periodic inspection intervals? [If no, mark Subgroup GDIM.IMPL questions 40-44 "N/A".]*

Assets Covered 88961 (75)  
Result Notes CNG has not requested alternate inspection intervals

78. Question Result, ID, References NA, GDIM.PI.PERIODICINSPDEVPERFRMIMPL.R, 192.1013(c)  
Question Text *Have the periodic inspections been implemented and have they been conducted at the specified (approved) alternate intervals?*

Assets Covered 88961 (75)  
Result Notes CNG has not requested alternate inspection intervals

79. Question Result, ID, References NA, GDIM.PI.PERIODICINSPDEVREQTIMPL.R, 192.1013(c)  
Question Text *Have all conditions been complied with that were required as part of the alternate inspection interval approval?*

Assets Covered 88961 (75)  
Result Notes CNG has not requested alternate inspection intervals

80. Question Result, ID, References NA, GDIM.PI.PERIODICINSPDEVPRFMESIMPL.R, 192.1013(c)  
Question Text *Do performance measure records indicate that deviation inspection resources were assigned to higher risk threat(s) and/or that that decreased inspection intervals contributed to an equal or greater overall level of safety has been achieved since the alternate inspection frequency was implemented?*

Assets Covered 88961 (75)  
Result Notes CNG has not requested alternate inspection intervals

81. Question Result, ID, References **NA, GDIM.PI.PERIODICINSPECTIONIMPL.R, 192.1013(c)**

Question Text *If that an equal or greater overall level of safety has not been achieved, has corrective action been taken?*

Assets Covered **88961 (75)**

Result Notes **CNG has not requested alternate inspection intervals**

Except as required to be disclosed by law, any inspection documentation, including completed protocol forms, summary reports, executive summary reports, and enforcement documentation are for internal use only by federal or state pipeline safety regulators. Some inspection documentation may contain information which the operator considers to be confidential. In addition, supplemental inspection guidance and related documents in the file library are also for internal use only by federal or state pipeline safety regulators (with the exception of documents published in the federal register, such as advisory bulletins). Do not distribute or otherwise disclose such material outside of the state or federal pipeline regulatory organizations. Requests for such information from other government organizations (including, but not limited to, NTSB, GAO, IG, or Congressional Staff) should be referred to PHMSA Headquarters Management.