

**PUBLIC AWARENESS PROGRAM EFFECTIVENESS INSPECTION  
SPECIFIC INFORMATION**

**Control Information**

<b>Inspection Start Date*:</b>	9-17-2013	
<b>Inspection End Date*:</b>	9-17-2013	
<b>OpID:</b>	2128	
<b>Parent Operator Name:</b>	MDU	
<b>Unit ID (s):</b>		
<b>State/Other ID:</b>		
<b>Activity Record ID No.</b>		
<b>Address of Company Official*:</b> 8113 W. Grandridge Blvd. Kennewick, WA 99336	<b>Company Official*:</b>	Eric Martuscelli
	<b>Title*:</b>	Vice President-Operations
	<b>Phone Number*:</b>	Off: (509) 734-4585
	<b>Fax Number:</b>	
	<b>Email Address*:</b>	Eric.Martuscelli@cngc.com
<b>Web Site:</b>	www.cngc.com	
<b>Total Mileage (from page 3)*:</b>	4366 miles	
<b>Total Mileage in HCA:</b>	6.68 Total: 1.5 OR 5.18 miles WA, 27365 in WA 7918 OR	
<b>Number of Services (For Distribution):</b>	276251 Total or and WA, WA is 210302 and OR 65949	
<b>Alternate MAOP (80% Rule):</b>	0	
<b>No. of Special Permits:</b>	0	

<b>Initial Date of Public Awareness Program*:</b>	10-7-2005
<b>Title of Current PAP*:</b>	Public Awareness Plan
<b>Current PAP Version*:</b>	6
<b>Current PAP Date*:</b>	9-30-2013

<b>Post Inspection Information</b>	
<b>Date Submitted for Approval:</b>	
<b>Director Approval:</b>	
<b>Approval Date:</b>	

\* Required field

**PHMSA Form 21 Public Awareness Program Effectiveness Inspection, July 21, 2011, Rev 0**

<b>Persons Interviewed*</b>	<b>Title/Organization*</b>	<b>Phone Number</b>	<b>Email Address</b>
Jen Bremer	Sander Resources	(713) 208-0273	
Lindsey Sanders	Sander Resources	(713) 208-0273	
Tina Beach	Compliance manager	(509) 734-4576	
Patti Chartray	Pipeline Specialist	(360) 405-4231	

*To add rows, press TAB with cursor in last cell.*

<b>External Support Entity Name*</b>	<b>Part of Plan and/or Evaluation*</b>	<b>Phone Number</b>	<b>Email Address</b>
Sander Resources	All	713 208 0273	

*To add rows, press TAB with cursor in last cell.*

<b>Inspector Representative(s)*</b>	<b>PHMSA/State*</b>	<b>Region/State*</b>	<b>Email Address</b>	<b>Lead*</b>
Kevin Hennesy	OR			<input type="checkbox"/> Y <input type="checkbox"/> N
John Ivey	OR			<input type="checkbox"/> Y <input type="checkbox"/> N
Tony Dorrough	WA			<input type="checkbox"/> Y <input type="checkbox"/> N
Patti Johnson	WA			<input checked="" type="checkbox"/> Y <input type="checkbox"/> N
				<input type="checkbox"/> Y <input type="checkbox"/> N

*To add rows, press TAB with cursor in last cell.*

**\* Required field**

**For this inspection**

- This plan becomes effective 9-30-2013. No probable violations or AOCs. CNG agreed to make 2 wording changes in PAP. A follow up inspection for the 4 year effectiveness evaluation will be completed in the 3<sup>rd</sup> quarter of 2014.

**Mileage Covered by Public Awareness Program (by Company and State)**

Based on the **most recently submitted annual report**, list each company and subsidiary separately, broken down by state (using 2-letter designation). Also list any new lines in operation that are not included on the most recent annual report. If a company has intrastate and/or interstate mileage in several states, use one row per state. If there are both gas and liquid lines, use the appropriate table for intrastate and/or interstate.

**Jurisdictional to Part 192 (Gas) Mileage (Interstate)**

Company Name (Gas Operator)	Operator ID	Product Type*	State*	Interstate Gathering Mileage*	Interstate Transmission Mileage	Interstate Distribution Mileage^*	Remarks (new or in HCA)

(To add rows, press TAB with cursor in last cell.)

**Jurisdictional to Part 192 (Gas) Mileage (Intrastate)**

Company Name (Gas Operator)	Operator ID	Product Type*	State*	Intrastate Gathering Mileage*	Intrastate Transmission Mileage*	Intrastate Distribution Mileage^*	Remarks (new or in HCA)
CNG		Gas	WA	0	123.51	4366.	5.18 miles
		Gas	OR	0	20.62	1484	1.5 miles

(To add rows, press TAB with cursor in last cell.)

**Jurisdictional to Part 195 (Hazardous Liquid) Mileage (Interstate)**

Company Name (Liquid Operator)	Operator ID	Product Type*	State*	Interstate Transmission Mileage*	Remarks (new or in HCA~)

(To add rows, press TAB with cursor in last cell.)

**Jurisdictional to Part 195 (Hazardous Liquid) Mileage (Intrastate)**

Company Name (Liquid Operator)	Operator ID	Product Type*	State*	Intrastate Transmission Mileage*	Remarks (new or in HCA~)

(To add rows, press TAB with cursor in last cell.)

<b>Total Mileage:</b>	
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- Supply company name and Operator ID, if not the master operator from the first page (i.e., for subsidiary companies).
  - Use OPS-assigned Operator ID. Where not applicable, leave blank or enter N/A
  - Use only 2-letter State codes, e.g., TX for Texas.
  - Enter number of applicable miles in applicable columns. (Only positive values. No need to enter 0 or N/A.)
- ^ Please do not include Service Line footage. This should only be MAINS.  
 \* Required Field  
 ~ Use Total HCA as reported on annual reports.

Please provide a comment or explanation for each inspection question.

## 1. Administration and Development of Public Awareness Program

### 1.01 Written Public Education Program

Does the operator have a written continuing public education program or public awareness program (PAP) in accordance with the general program recommendations in the American Petroleum Institute's (API) Recommended Practice (RP) 1162 (incorporated by reference), by the required date, except for master meter or petroleum gas system operators?

(Reference: § 192.616 (h); § 195.440 (h))

- Verify the operator has a written public awareness program (PAP).
- Review any Clearinghouse deficiencies and verify the operator addressed previous Clearinghouse deficiencies, if any, addressed in the operator's PAP.
- Identify the location where the operator's PAP is administered and which company personnel is designated to administer and manage the written program.
- Verify the date the public awareness program was initially developed and published.

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments: 1. This is revision 6.  <b>Bullet 1:</b> CNG has PAP,  <b>Bullet 2:</b> Clearinghouse deficiencies have been addressed  <b>Bullet 3:</b> 1. Plan administered in Kennewick Headquarters office.  2. Personnel found in Exhibit 4: Internal support Resources  <b>Bullet 4:</b> Initial Program developed and published 10-7-2005
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

### 1.02 Management Support

Does the operator's program include a statement of management support (i.e., is there evidence of a commitment of participation, resources, and allocation of funding)?

(Reference: § 192.616 (a); § 195.440 (a); API RP 1162 Section 2.5 and 7.1)

- Verify the PAP includes a written statement of management support.
- Determine how management participates in the PAP.
- Verify that an individual is named and identified to administer the program with roles and responsibilities.
- Verify resources provided to implement public awareness are in the PAP. Determine how many employees involved with the PAP and what their roles are.
- Determine if the operator uses external support resources for any implementation or evaluation efforts.

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments: <b>Bullet 1:</b> Section .01, cover letter
<input type="checkbox"/> U - Unsatisfactory (explain)*	

<input type="checkbox"/> N/A - Not Applicable (explain)*	Reviewed emailed dated 8-22-2014 in regard to water follies, MDU corp fast facts 811 participation, 7-25-13 email, a second 7-25, 2013 email  <b>Bullet 2:</b> Section .01 Reviewed emailed dated 8-22-2014 in regard to water follies, MDU corp fast facts 811 participation, 7-25-13 email, a second 7-25, 2013 email  <b>Bullet 3:</b> Section .01 and Exhibit 1: Internal support Resources
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

**1.03 Unique Attributes and Characteristics**

Does the operator’s program clearly define the specific pipeline assets or systems covered in the program and assess the unique attributes and characteristics of the pipeline and facilities?

(Reference: § 192.616 (b); § 195.440 (b); API RP 1162 Section 2.7 and Section 4)

- Verify the PAP includes all of the operator’s system types/assets covered by PAP (gas, liquid, HVL, storage fields, gathering lines etc).
- Identify where in the PAP the unique attributes and characteristics of the pipeline and facilities are included (i.e. gas, liquids, compressor station, valves, breakout tanks, odorizer).

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments: <b>Bullet 1:</b> ok  <b>Bullet 2:</b> Section .02 ok
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

**1.04 Stakeholder Audience Identification**

Does the operator’s program establish methods to identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents?

(Reference: § 192.616 (d), (e), (f); § 195.440 (d), (e), (f); API RP 1162 Section 2.2 and Section 3)

- Identify how the operator determines stakeholder notification areas and distance on either side of the pipeline.
- Determine the process and/or data source used to identify each stakeholder audience.
- Select a location along the operator’s system and verify the operator has a documented list of stakeholders consistent with the requirements and references noted above.

- Affected public
- Emergency officials
- Public officials
- Excavators

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments:
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<input type="checkbox"/> U - Unsatisfactory (explain)*	DISTANCE 660 FEET found under targeted public
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
<p><b>Bullet 1:</b> ok Affected public Customers are end users Targeted public along transmission lines General public residences are places of congregation (not transmission).</p> <p>Use HUD code for determining effective public.</p> <p>Includes all Emergency responders in service territory, extends to county boundary</p> <p>Public officials same as emergency response</p> <p>Excavators thru PAPA and are IDed thru one call and CNG contractors</p> <p><b>Bullet 2:</b> ok PAPA, SIC codes and one call</p> <p><b>Bullet 3:</b> 1. Bellingham in berry fields – only mail to residence but these are mailed to under the IMP ok  2. ok, Compressor Station  3. ok, Transmission line from Shelton to Bremerton</p>	
Check exactly one box above. * Required field	

**1.05 Message Frequency and Message Delivery**

Does the operator’s program define the combination of messages, delivery methods, and delivery frequencies to comprehensively reach all affected stakeholder audiences in all areas in which the operator transports gas, hazardous liquid, or carbon dioxide?

(Reference: § 192.616 (c); § 195.440 (c); API RP 1162 Sections 3-5)

- Identify where in the operator’s PAP the combination of messages, delivery methods, and delivery frequencies are included for the following stakeholders:

- Affected public
- Emergency officials
- Public officials
- Excavators

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments: <b>Bullet 1:</b> <b>Combination of messages</b> - Section .031, .032, .033, .034, .035 and .036
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	

	<p><b>Delivery frequencies –</b> Affected public Section .031, .035 schools CNG wording makes more stringent “at least once each calendar year, but at intervals not exceeding 15 months” is ok</p> <p><b>Emergency Responders</b> Section .032 ok CNG wording makes more stringent “at least once each calendar year, but at intervals not exceeding 15 months” is ok</p> <p><b>Public Officials –</b> Section .033 ok CNG wording makes more stringent “at intervals not exceeding 39 months” ok</p> <p><b>Excavators –</b> Section .034, .036 ok CNG wording makes more stringent “at least once each calendar year, but at intervals not exceeding 15 months” is ok</p> <p><b>Delivery Methods –</b> <b>Affected Public –</b> Section .031.035 ok</p> <p><b>Emergency Responder’s –</b> Section .032 – ok Papa has changed; it is now by county and mailing only includes the companies in a particular county. Also, the mailer contains a cover letter that is operator specific.</p> <p><b>Public Officials –</b> Section .033 – Papa has changed; it is now by county and mailing only includes the companies in a particular county. Also, the mailer contains a cover letter that is operator specific.</p> <p><b>Excavators –</b> Section .034 – Papa has changed; it is now by county and mailing only includes the companies in a particular county. Also, the mailer contains a cover letter that is operator specific.</p> <p>Section .036 One Call Centers is ok</p>
Check exactly one box above. * Required field	

**1.06 Written Evaluation Plan**

Does the operator's program include a written evaluation process that specifies how the operator will periodically evaluate program implementation and effectiveness? If not, did the operator provide justification in its program or procedural manual?

**(Reference: § 192.616 (c), (i); § 195.440 (c), (i))**

- Verify the operator has a written evaluation plan that specifies how the operator will conduct and evaluate self-assessments (annual audits) and effectiveness evaluations.
- Verify the operator’s evaluation process specifies the correct frequency for annual audits (1 year) and effectiveness evaluations (no more than 4 years apart).
- Identify how the operator determined a statistical sample size and margin-of-error for stakeholder audiences’ surveys and feedback.

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	<p>Comments:</p> <ol style="list-style-type: none"> <li>1. CNG has written evaluation process ok</li> <li>2. CNG will periodically evaluates program implementation</li> <li>3. CNG will periodically evaluate program effectiveness</li> </ol> <p><b>Bullet 1:</b></p> <ol style="list-style-type: none"> <li>1. Section .061 annual and .062 4 year effectiveness</li> <li>2. CNG has written evaluation plan that specifies how the operator will evaluate self-assessments (annual audits) Supplemental list for next year is D on page 37</li> </ol> <p>CNG will add education material distribution on page 15</p> <ol style="list-style-type: none"> <li>3. CNG has written evaluation plan that specifies how the operator will conduct effectiveness evaluations. .062 Ok</li> <li>4. CNG has written evaluation plan that specifies how the operator will evaluate effectiveness evaluations. .062 ok</li> </ol> <p><b>Bullet 2:</b> Section .062 ok</p> <p><b>Bullet 3:</b> .062 Effectiveness page 19/20 ok</p>
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

## 2. Program Implementation

### 2.01 English and other Languages

Did the operator develop and deliver materials and messages in English and in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator’s areas?

(Reference: § 192.616 (g); § 195.440 (g); API RP 1162 Section 2.3.1)

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- Determine if the operator delivers material in languages other than English and if so, what languages.
- Identify the process the operator used to determine the need for additional languages for each stakeholder audience.
- Identify the source of information the operator used to determine the need for additional languages and the date the information was collected.

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments: <b>Bullet 1:</b> CNG added 6 other languages in addition to Spanish and English.  <b>Bullet 2:</b> .04 identifies process used to determine additional language needs  <b>Bullet 3:</b> CNG uses US dept of justice voter printing ballot law used: 5% and 50% limited English proficiency. ok
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

**2.02 Message Type and Content**

Did the messages the operator delivered specifically include provisions to educate the public, emergency officials, local public officials, and excavators on the:

- Use of a one-call notification system prior to excavation and other damage prevention activities;
- Possible hazards associated with unintended releases from a gas, hazardous liquid, or carbon dioxide pipeline facility;
- Physical indications of a possible release;
- Steps to be taken for public safety in the event of a gas, hazardous liquid, or carbon dioxide pipeline release; and
- Procedures to report such an event (to the operator)?

**(Reference: § 192.616 (d); (f); § 195.440 (d), (f))**

- Verify all required information was delivered to each of the primary stakeholder audiences.
- Verify the phone number listed on message content is functional and clearly identifies the operator to the caller.

- Affected public
- Emergency officials
- Public officials
- Excavators

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments: <b>Bullet 1:</b> <b>Affected Public</b> –Section .031, ok  <b>Emergency Responders-</b> Section .032, - ok  <b>Public Officials -</b> Section .033 - - ok  <b>Excavators</b> – Section .034 - ok  <b>Bullet 2: Reviewed phone number on hand outs, tried phone number</b>
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

**2.03 Messages on Pipeline Facility Locations**

Did the operator develop and deliver messages to advise affected municipalities, school districts, businesses, and residents of pipeline facility location?

**(Reference: § 192.616 (e), (f); § 195.440 (e), (f))**

- Verify that the operator developed and delivered messages advising municipalities, school districts, businesses, residents of pipeline facility locations.

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments: <b>Bullet 1:</b> ok CNG agreed to clarify the wording meaning of Schools and school (k-6). All schools are affected public and k-6 will be treated as independent service group. Without this change, CNG limits the meaning of schools to mean just k-6 and that is not the intent of PAP
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	

	Buss and residence are included under effected public,
	Municipalities are included under public officials
Check exactly one box above. * Required field	

**2.04 Baseline Message Delivery Frequency**

Did the operator’s delivery for materials and messages meet or exceed the baseline frequencies specified in API RP 1162, Table 2-1 through Table 2.3? If not, did the operator provide justification in its program or procedural manual?

(Reference: § 192.616 (c); § 195.440 (c))

- Identify message delivery (using the operator’s last five years of records) for the following stakeholder audiences:

- Affected public
- Emergency officials
- Public officials
- Excavators

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments: <b>Bullet 1:</b> Reviewed the 2013 PAP Schedule that included last 5 years of messaging
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

**2.05 Considerations for Supplemental Program Enhancements**

Did the operator consider, along all of its pipeline systems, relevant factors to determine the need for supplemental program enhancements as described in API RP 1162 for each stakeholder audience?

(Reference: § 192.616 (c); § 195.440 (c); API RP 1162 Section 6.2)

- Determine if the operator has considered and/or included other relevant factors for supplemental enhancements.

- Affected public
- Emergency officials
- Public officials
- Excavators

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments: <b>Bullet 1:</b> yes, other relevant factors such as 811 media day have been considered
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

**2.06 Maintaining Liaison with Emergency Response Officials**

Did the operator establish and maintain liaison with appropriate fire, police, and other public officials to: learn the responsibility and resources of each government organization that may respond, acquaint the officials with the operator’s ability in responding to a pipeline emergency, identify the types of

pipeline emergencies of which the operator notifies the officials, and plan how the operator and other officials can engage in mutual assistance to minimize hazards to life or property?

(Reference: § 192.616 (c); § 195.440 (c); API RP 1162 Section 4.4)

- Examine the documentation to determine how the operator maintains a relationship with appropriate emergency officials.
- Verify the operator has made its emergency response plan available, as appropriate and necessary, to emergency response officials.
- Identify the operator’s expectations for emergency responders and identify whether the expectations are the same for all locations or does it vary depending on locations.
- Identify how the operator determined the affected emergency response organizations have adequate and proper resources to respond.
- Identify how the operator ensures that information was communicated to emergency responders that did not attend training/information sessions by the operator.

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	<p>Comments:</p> <p><b>Bullet 1:</b> CNG maintains a relationship with emergency officials – Reviewed graph of liaison activities for 2010, 2011, 2012 and 2013. PAP form 1001 is the documentation for the graph. There is a liaison list,</p> <p>Reviewed graph for emergency responders reached by PAPA mailings</p> <p>Reviewed PAPA form for Emergency Responder Capabilities by organizations. Over 600 responded and took the on line survey. To entice responder agencies to fill out on line survey PAPA offered \$3000 drawing for emergency responders in the US. Cowlitz in WA won \$3000.</p> <p><b>Bullet 2:</b> Mailed material states contact CNG for additional emergency response material.</p> <p>Emergency Plan now on CNG SharePoint, can be access by CNG employees. Parts of emergency plan are given to responders.</p> <p>Reviewed Emergency Contact Checklist. In this checklist if they request training, they are offered portions of emergency plan. The maps are the most popular item requested.</p> <p><b>Bullet 3:</b></p> <p>A. CNG’s expectations for emergency responders are the same for OR and WA. In fact, for all PAPA users</p> <p>B. Expectations are the same for all locations and</p>
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	

	<p>the expectations are the same for OR and WA. In fact, for all PAPA users</p> <p><b>Bullet 4:</b> CNG determined the affected emergency response organizations have adequate and proper resources to respond – <a href="#">Reviewed capability survey.</a></p> <p><b>Bullet 5:</b> CNG ensures that information was communicated to emergency responders that did not attend training/information sessions by the operator - CNG policy CP 500 .032, information sent and documented by mail.</p>
Check exactly one box above. * Required field	

### 3. Program Evaluation & Continuous Improvement (Annual Audits)

#### 3.01 Measuring Program Implementation

Has the operator performed an audit or review of its program implementation annually since it was developed? If not, did the operator provide justification in its program or procedural manual?

(Reference: § 192.616 (c), (i); § 195.440 (c), (i); API RP 1162 Section 8.3)

- Verify the operator performed an annual audit or review of the PAP for each implementation year.

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	<p>Comments:</p> <p><b>Bullet 1:</b> in original inspection, no annual reports were written. CNG created these past annual audits (2006 to 2010) with 2012 dates for going forward. <a href="#">Reviewed these and 2013 annual audit</a></p>
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

#### 3.02 Acceptable Methods for Program Implementation Audits

Did the operator use one or more of the three acceptable methods (i.e., internal assessment, 3rd-party contractor review, or regulatory inspections) to complete the annual audit or review of its program implementation? If not, did the operator provide valid justification for not using one of these methods?

(Reference: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.3)

- Determine how the operator conducts annual audits/reviews of its PAP.

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	<p>Comments:</p> <p><b>Bullet 1:</b> <a href="#">Reviewed exhibit 4 which is annual audit for and it asks the method of audit conducted.</a> No reason for justification</p>
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

#### 3.03 Program Changes and Improvements

Did the operator make changes to improve the program and/or the implementation process based on the results and findings of the annual audit? If not, did the operator provide justification in its program or procedural manual?

(Reference: § 192.616 (c); § 195.440 (c); API RP 1162 Section 8.3)

- Determine if the operator assessed the results of its annual PAP audit/review then developed and implemented changes in its program, as a result.
- If not, determine if the operator documented the results of its assessment and provided justification as to why no changes were needed.

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments: <b>Bullet 1:</b> yes see notes for above. <b>Bullet 2:</b> yes, in CP 500 section .05
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

#### 4. Program Evaluation & Continuous Improvement (Effectiveness)

##### 4.01 Evaluating Program Effectiveness

Did the operator perform an effectiveness evaluation of its program (or no more than 4 years following the effective date of program implementation) to assess its program effectiveness in all areas along all systems covered by its program? If not, did the operator provide justification in its program or procedural manual?

(Reference: § 192.616 (c); § 195.440 (c); API RP 1162 Section 8.4)

- Verify the operator conducted an effectiveness evaluation of its program (or no more than 4 years following the effective date of program implementation).
- Document when the effectiveness evaluation was completed.
- Determine what method was used to perform the effectiveness evaluation (in-house, by 3<sup>rd</sup> party contractor, participation in and use the results of an industry group or trade association).
- Identify how the operator determined the sample sizes for audiences in performing its effectiveness evaluation.

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments: <b>Bullet 1:</b> from original inspection went back and did 4 year evaluation based on 2006 thru 2010, with current date. Full 4 year evaluation scheduled in 2014. <b>Bullet 2:</b> May 2013, the 4 year evaluation was created for 2006 thru 2010. As mentioned above, a full 4 year evaluation will be conducted in 23 <sup>rd</sup> quarter of 2014. <b>Bullet 3:</b> 3 <sup>rd</sup> party contractor and in house <b>Bullet 4:</b> for Affected Public 2007 Hebert Research Inc conducted effective survey. 96.3 confidence level, Margin of error +/- 3.7
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
years	

	<p>Feb 2, 2010 Emergency Responder by PAPA was margin of error +/- 4.5 with 95% confidence. CNG conducted effective survey using central survey they had 95% confidence with margin of error +/- 4.5.</p> <p><b>Emergency Responders</b> 2007 and 2010 PAPA survey margin of error +/- 4.5 with 95% confidence, 502 interviews</p> <p><b>Public Officials</b> Jan/Feb 2010 and 2007 interviews based on PAPA interviews indicate margin of error is +/- 4.5 with 95% confidence. 506 interview</p> <p><b>Excavators</b> 2007 and 2010 based on PAPA interviews margin of error is +/- 4.5 with 95% confidence, 505 interviews</p>
Check exactly one box above. * Required field	

**4.02 Measure Program Outreach**

In evaluating effectiveness, did the operator track actual program outreach for each stakeholder audience within all areas along all assets and systems covered by its program? If not, did the operator provide justification in its program or procedural manual?

(Reference: § 192.616 (c); § 195.440 (c); API RP 1162 Section 8.4.1)

- Examine the process the operator used to track the number of individuals or entities reached within each intended stakeholder audience group.
- Determine the outreach method the operator used to perform the effectiveness evaluation (e.g., questionnaires, telephone surveys, etc).
- Determine how the operator determined the statistical sample size and margin-of-error for each of the four intended stakeholder audiences.

- Affected public
- Emergency officials
- Public officials
- Excavators

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	<p>Comments:</p> <p><b>Bullet 1:</b> <b>Affected Public</b> <b>End user</b> get mail 2xs a year in bill</p> <p><b>General public:</b> In 2013 used Valupak and have received over 2000 responses.</p> <p><b>Targeted</b> from mailing list, mailing is 1<sup>st</sup> class. Because they use 1<sup>st</sup> class mail they get returned mail for bad addresses, etc. Previously on normal mailer got 5% back.</p>
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	

	<p><b>Emergency Responders</b> – on list get mailing</p> <p><b>Public Officials</b> – on list get mailing. List size has increased</p> <p><b>Excavator</b> – on list get mailing.</p> <p><b>Bullet 2:</b> The outreach method the operator used to perform the effectiveness evaluation is surveys both volunteers and professional, questionnaire (respond on line or mail back 73 responded).</p> <p><b>Bullet 3:</b> This is duplicate of question 4.01 4<sup>th</sup> bullet.</p>
Check exactly one box above. * Required field	

**4.03 Measure Percentage Stakeholders Reached**

Did the operator determine the percentage of the individual or entities actually reached within the target audience within all areas along all systems covered by its program? If not, did the operator provide justification in its program or procedural manual?

(Reference: § 192.616 (c); § 195.440 (c); API RP 1162 Section 8.4.1)

- Document how the operator determined the statistical sample size and margin-of-error for each of the four intended stakeholder audiences.
- Document how the operator estimated the percentage of individuals or entities actually reached within each intended stakeholder audience group.

- Affected public
- Emergency officials
- Public officials
- Excavators

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	<p>Comments:</p> <p><b>Bullet 1:</b> duplicate question. CP 500 .062</p> <p><b>Bullet 2:</b> Section .062, CP 500</p>
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

**4.04 Measure Understandability of Message Content**

In evaluating effectiveness, did the operator assess the percentage of the intended stakeholder audiences that understood and retained the key information in the messages received, within all areas along all assets and systems covered by its program? If not, did the operator provide justification in its program or procedural manual?

(Reference: § 192.616 (c); § 195.440 (c); API RP 1162 Section 8.4.2)

- Examine the operator’s evaluation results and data to assess the percentage of the intended stakeholder audience that understood and retained the key information in each PAP message.
- Verify the operator assessed the percentage of the intended stakeholder audience that (1) understood and (2) retained the key information in each PAP message.
- Determine if the operator pre-tests materials.

- Affected public
- Emergency officials
- Public officials
- Excavators

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	<p>Comments:</p> <p><b>Bullet 1 and 2:</b> from 2010 Central survey Inc. , Affected Public 30% aware of pipelines, 7% tried to get more information, 80% said would call 911, 55% said would call Pipeline co with leak information, 50% would warn neighbors, 43% would leave the area, 31% would call the fire dept, 30% knew to call 811, 14% actually called 811. 44% believed they should call the operator before digging. Only information from CNG WA and OR surveys</p> <p>2010 phone survey of <b>emergency responders:</b> 66% of emergency responders believed natural gas was associated with pipelines. 88-94% are aware of pipeline in community, 31% believed best way to locate gas facility is call LDC, 64% know about NPMS, 56% know correct number to call, 44% know co name on markers, 45% know product product on marker, 63% of fire services are confident they can respond to pipeline incident, 63% of law enforcement confident they can respond to pipeline incident, 71% of haz mat were very confident they could respond to gas incident.</p> <p><b>Public Officials:</b> Survey findings: 52% attribute pipelines to natural gas, 46% attributed pipelines to oil, 54% of elected officials knew name of local pipeline operator. 37% believe yellow marker purpose is to prevent minimize damage, 18% believe gas company belong to one call, 13% minimize damage by routine inspections, 31% knew of NPMS, 93% of public officials are aware of one call, 23% would like more information of emergency response, 31% would more general information, 17% would like maps</p> <p><b>Excavator:</b> from PAPA; 87% are aware of one call. 69% know to call 2 or 3 days before digging, 55% use vacuum equipment, All above information collected from combined PAPA study that included 46 states for excavators</p>
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	

	<b>Bullet 3:</b> Did pre-test for targeted public and general public. CNG does not do pre testing for customers, it is redundant
Check exactly one box above. * Required field	

**4.05 Measure Desired Stakeholder Behavior**

In evaluating its public awareness program effectiveness, did the operator attempt to determine whether appropriate preventive behaviors have been understood and are taking place when needed, and whether appropriate response and mitigative behaviors would occur and/or have occurred? If not, did the operator provide justification in its program or procedural manual?

(Reference: § 192.616 (c); § 195.440 (c); API RP 1162 Section 8.4.3)

- Examine the operator’s evaluation results and data to determine if the stakeholders have demonstrated the intended learned behaviors.
- Verify the operator determined whether appropriate prevention behaviors have been understood by the stakeholder audiences and if those behaviors are taking place or will take place when needed.

- Affected public
- Emergency officials
- Public officials
- Excavators

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments: <b>Bullet 1:</b> 2010 will be bench mark and 2014 will be the first 4 year effectiveness evaluation with the new PAP. That evaluation will demonstrate if intended behaviors have been learned. For annual evaluations have demonstrated learned behaviors of 50% increase for effected public and 73% for customers along transmission  <b>Bullet 2:</b> appropriate prevention behaviors have been understood from current annual information and all information will be documented in 4 year evaluation next year.
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

**4.06 Measure Bottom-Line Results**

In evaluating its public awareness program effectiveness, did the operator attempt to measure bottom-line results of its program by tracking third-party incidents and consequences including: (1) near misses, (2) excavation damages resulting in pipeline failures, (3) excavation damages that do not result in pipeline failures? Did the operator consider other bottom-line measures, such as the affected public's perception of the safety of the operator's pipelines? If not, did the operator provide justification in its program or procedural manual?

(Reference: § 192.616 (c); § 195.440 (c); API RP 1162 Section 8.4.4)

- Examine the operator’s process for measuring bottom-line results of its program.
- Verify the operator measured bottom-line results by tracking third-party incidents and consequences.

- Determine if the operator considered and attempted to measure other bottom-line measures, such as the affected public’s perception of the safety of the operator’s pipelines. If not, determine if the operator has provided justification in its program or procedural manual for not doing so.

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments: <b>Bullet 1 - 3:</b> damage per thousand locates are best measure for bottom line results. From 2006 to now there are 4 areas in CNG territory where damages up and this coincides with DIMP findings. The areas ar Walla Walla, Yakima and Aberdeen in WA and Pendleton, OR . CNG demonstrates this in graph form
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

**4.07 Program Changes**

Did the operator identify and document needed changes and/or modifications to its public awareness program(s) based on the results and findings of its program effectiveness evaluation? If not, did the operator provide justification in its program or procedural manual?

(Reference: § 192.616 (c); § 195.440 (c); API RP 1162 Section 2.7 Step 12 and 8.5)

- Examine the operator’s program effectiveness evaluation findings.
- Identify if the operator has a plan or procedure that outlines what changes were made.
- Verify the operator identified and/or implemented improvements based on assessments and findings.

<input type="checkbox"/> S – Satisfactory (explain)*	Comments: The 4 year effectiveness evaluation has not been completed because of lack of time with the new PAP. There is a process and the information is being collected and old information being combined for use.
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input checked="" type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

**5. Inspection Summary & Findings**

**5.01 Summary**

*5.02 Findings*