

# Inspection Output (IOR)

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## Inspection Information

Inspection Name	8271 Klickitat PUD Public Awareness	Operator(s)	KLICKITAT PUBLIC UTILITY DISTRICT (39809)	Plan Submitted	09/01/2021
Status	PLANNED	Lead	Darren Tinnerstet	Plan Approval	09/02/2021 by Sean Mayo
Start Year	2021	Observer(s)	Scott Rukke, David Cullom, Dennis Ritter, Lex Vinsel, Anthony Dorrough, Derek Norwood, Scott Anderson	All Activity Start	10/06/2021
System Type	GT	Supervisor	Joe Subsits	All Activity End	10/06/2021
Protocol Set ID	GT.2021.01	Director	Sean Mayo	Inspection Submitted	--
				Inspection Approval	--

## Inspection Summary

### Inspection Scope and Summary

Review of Klickitat County PUD Public Awareness Program #8271

Inspection was conducted virtually do to Operator Covid restrictions.

Documents reviewed include KPUD Operations and Maintenance Manual (OMM) and KPUD Public Awareness Manual (PA Manual)

### Facilities visited and Total AFOD

10/6/21 (Virtual records review) = 1 AFOD days

### Summary of Significant Findings

*(DO NOT Discuss Enforcement options)*

No issues found

### Primary Operator contacts and/or participants

Doug Senn - Tech 2

Alex Casimiro - Accounting Clerk

Jonah Humphries - Plant Superintendent

Roy Rodgers - CPE Consultant

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

Jim Smith - KPUD General Manager

1313 South Columbus Ave.

Goldendale, WA 98620

## Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	88970 (1,934)	Klickitat PUD	unit	88970	--	46	46	46	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.	88970 (1,934)	n/a	PD	P, R, O, S	Detail	

## Plan Implementations

Activity #	SMART Name	SMART Act#	Start Date	End Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete
1.	KPUD PA	--	10/06/2021	10/06/2021	n/a	all planned questions	all assets	all types	46	46	46	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	KPUD PA	COMPLETED	10/07/2021	KPUD PA	--

## Results (all values, 46 results)

55 (instead of 46) results are listed due to re-presentation of questions in more than one sub-group.

### EP.ERG: Emergency Response

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

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

Assets Covered 88970 (1,934)

Result Notes Reviewed Public Awareness Outreach for 2018-2020. The town of Roosevelt has no police department or public works department. Klickitat County Public Works (Goldendale) maintains roads. The fire district #9 is a volunteer department with no paid staff. Klickitat County Sheriff's office is local LE agency. Klickitat County Fire Protection District #2 (Town of Bickleton). Section 2.2 of KPUD OMM is procedure. Confirmed contacts in 2020, attempted to sponsor training events but unable to due to Covid pandemic. 2021, met with Chief Justin Bentley (Klickitat County Fired District #9). Provided information about the pipeline.

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

2. Question Result, ID, References Sat, MO.RW.PATROL.P, 192.705(a) (192.705(b), 192.705(c)) (also presented in: PD.RW)

Question Text *Does the process adequately cover the requirements for patrolling the ROW and conditions reported?*

Assets Covered 88970 (1,934)

Result Notes KPUD OMM Procedure P-9.

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

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

Assets Covered 88970 (1,934)

Result Notes Reviewed ROW patrol records for 2020: (Required to be conducted annually; operator does bi-annually). Also includes leak survey in this patrol report.

5/26/2020 (Form F-17) Pipeline Patrol Report - No issues noted

11/30/2020 (Form F-17) Pipeline Patrol Report - No issues note

4. Question Result, ID, Sat, MO.RW.ROWMARKER.O, 192.707(a) (192.707(b), 192.707(c), 192.707(d)) (also presented in: References PD.RW)  
Question Text *Are line markers placed and maintained as required?*  
Assets Covered 88970 (1,934)  
Result Notes Reviewed line markers via Google earth and images provided by Operator. Road crossing is marked with pins driven into the pavement. Unable to physically verify due to Covid restrictions on contact with operator personnel. Reviewed line marker records (78 total markers over both lines).
5. Question Result, ID, Sat, MO.RW.ROWCONDITION.O, 192.705(a) (192.705(c)) (also presented in: PD.RW)  
References  
Question Text *Are the ROW conditions acceptable for the type of patrolling used?*  
Assets Covered 88970 (1,934)  
Result Notes Reviewed Google map of native ROW. The only issue that presents itself is tumble weeds and tall grass that is the result of wind.
6. Question Result, ID, Sat, MO.RW.ROWMARKER.P, 192.707(a) (192.707(b), 192.707(c), 192.707(d)) (also presented in: References PD.RW)  
Question Text *Does the process adequately cover the requirements for placement of ROW markers?*  
Assets Covered 88970 (1,934)  
Result Notes KPUD OMM Procedure P-21.
7. Question Result, ID, NA, MO.RW.GOMHAZARD.P, 192.612(a) (192.612(c)(2), 192.612(c)(3)) (also presented in: PD.RW)  
References  
Question Text *Does the process require identification of pipelines in the Gulf of Mexico at risk of being exposed underwater or hazards to navigation?*  
Assets Covered 88970 (1,934)  
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
8. Question Result, ID, NA, MO.RW.GOMHAZARD.R, 192.709(c) (192.612(a), 192.612(b)) (also presented in: PD.RW)  
References  
Question Text *Do records indicate steps taken to identify and inspect pipelines in the Gulf of Mexico at risk of being exposed underwater pipelines or hazards to navigation?*  
Assets Covered 88970 (1,934)  
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
9. Question Result, ID, NA, MO.RW.GOMHAZARD.O, 192.612(c)(2) (also presented in: PD.RW)  
References  
Question Text *Are pipelines in the Gulf of Mexico at risk of being exposed underwater pipelines or hazards to navigation marked as required?*  
Assets Covered 88970 (1,934)  
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

## PD.DP: Damage Prevention

10. Question Result, ID, Sat, PD.DP.PDPROGRAM.P, 192.614(a)  
References  
Question Text *Is a damage prevention program approved and in place?*  
Assets Covered 88970 (1,934)  
Result Notes KPUD OMM Section 5
11. Question Result, ID, Sat, PD.DP.ONECALL.P, 192.614(b)  
References

Question Text *Does the process require participation in qualified one-call systems?*

Assets Covered 88970 (1,934)

Result Notes KPUD PA Manual Section 2.4

12. Question Result, ID, References Sat, PD.DP.EXCAVATEMARK.P, 192.614(c)(5)

Question Text *Does the process require marking proposed excavation sites to CGA Best Practices or use more stringent and accurate requirements?*

Assets Covered 88970 (1,934)

Result Notes KPUD OMM Procedures P-1 and P-2.

13. Question Result, ID, References Sat, PD.DP.TPD.P, 192.614(c)(1)

Question Text *Does the process specify how reports of Third Party Activity and names of associated contractors or excavators are input back into the mail-outs and communications with excavators along the system?*

Assets Covered 88970 (1,934)

Result Notes KPUD PA Manual Section 9.3

14. Question Result, ID, References Sat, PD.DP.TPDONECALL.P, 192.614(c)(3)

Question Text *Does the process specify how reports of TPD are checked against One-Call tickets?*

Assets Covered 88970 (1,934)

Result Notes KPUD PA Manual Section 8.1

15. Question Result, ID, References Sat, PD.DP.ONECALL.O, 192.614(c)(3)

Question Text *Observe operator process a "One Call" ticket.*

Assets Covered 88970 (1,934)

Result Notes Reviewed locate ticket #20352268 from 8/20/2020. Reviewed pictures of locate marks taken by operator. This is the first locate ticket completed by operator. Documented very well.

16. Question Result, ID, References Sat, PD.DP.PDPROGRAM.R, 192.614(c)

Question Text *Does the damage prevention program meet minimum requirements specified in 192.614(c)?*

Assets Covered 88970 (1,934)

Result Notes Yes

17. Question Result, ID, References Sat, PD.DP.DPINFOGATHER.P, 192.917(b) (192.935(b)(1)(ii))

Question Text *Does the process require critical damage prevention information be gathered and recorded during pipeline patrols, leak surveys, and integrity assessments?*

Assets Covered 88970 (1,934)

Result Notes KPUD PA Manual Section 11

KPUD OMM Procedure 9

18. Question Result, ID, References Sat, PD.DP.DPINFOGATHER.R, 192.947(b) (192.917(b), 192.935(b)(1)(ii))

Question Text *Do records demonstrate that critical damage prevention information is being gathered and recorded during pipeline patrols, leakage surveys, and integrity assessments?*

Assets Covered 88970 (1,934)

Result Notes KPUD OMM Form F-17 is form that would address these issues. No threats or damages have occurred to date.

## PD.PA: Public Awareness

19. Question Result, ID, References Sat, PD.PA.ASSETS.P, 192.616(b) (API RP 1162 Section 2.7 Step 4)

Question Text *Does the program clearly identify the specific pipeline systems and facilities to be included in the program, along with the unique attributes and characteristics of each?*

Assets Covered 88970 (1,934)

Result Notes [KPUD PA Manual Section 5.0](#)

[Public Officials pipeline safety information sheet.](#)

20. Question Result, ID, References [Sat, PD.PA.AUDIENCEID.P, 192.616\(d\) \(192.616\(e\), 192.616\(f\), API RP 1162 Section 2.2, API RP 1162 Section 3\)](#)  
Question Text *Does the 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?*  
Assets Covered [88970 \(1,934\)](#)  
Result Notes [KPUD PA Manual Section 6.0](#)
21. Question Result, ID, References [Sat, PD.PA.MGMTSUPPORT.P, 192.616\(a\) \(API RP 1162 Section 2.5, API RP 1162 Section 7.1\)](#)  
Question Text *Does the operator's program documentation demonstrate management support?*  
Assets Covered [88970 \(1,934\)](#)  
Result Notes [KPUD PA Manual Section 3.0](#)
22. Question Result, ID, References [Sat, PD.PA.PROGRAM.P, 192.616\(a\) \(192.616\(h\)\)](#)  
Question Text *Has the continuing public education (awareness) program been established as required?*  
Assets Covered [88970 \(1,934\)](#)  
Result Notes [KPUD PA Manual Section 2.1](#)
- [KPUD OMM Section 3.4](#)
23. Question Result, ID, References [Sat, PD.PA.AUDIENCEID.R, 192.616\(d\) \(192.616\(e\), 192.616\(f\), API RP 1162 Section 2.2, API RP 1162 Section 3\)](#)  
Question Text *Do records 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 to which it sends public awareness materials and messages?*  
Assets Covered [88970 \(1,934\)](#)  
Result Notes [KPUD PA Manual Section 6.0 - 6.4.](#)
- [Reviewed electronic notifications of messages to affected stakeholders.](#)
24. Question Result, ID, References [Sat, PD.PA.MESSAGES.P, 192.616\(c\) \(API RP 1162 Section 3, API RP 1162 Section 4, API RP 1162 Section 5\)](#)  
Question Text *Does the program define the combination of messages, delivery methods, and delivery frequencies to comprehensively reach all affected stakeholder audiences in all areas where gas is transported?*  
Assets Covered [88970 \(1,934\)](#)  
Result Notes [KPUD PA Manual Section 7.1](#)
25. Question Result, ID, References [Sat, PD.PA.SUPPLEMENTAL.P, 192.616\(c\) \(API RP 1162 Section 6.2\)](#)  
Question Text *Were relevant factors considered to determine the need for supplemental public awareness program enhancements for each stakeholder audience, as described in API RP 1162?*  
Assets Covered [88970 \(1,934\)](#)  
Result Notes [KPUD PA Manual Section 9.0](#)
26. Question Result, ID, References [Sat, PD.PA.EDUCATE.R, 192.616\(d\) \(192.616\(f\)\)](#)  
Question Text *Did delivered messages specifically include provisions to educate the public, emergency officials, local public officials, and excavators on: (1) Use of a one-call notification system prior to excavation and other damage prevention activities; (2) Possible hazards associated with unintended releases from a gas pipeline facility; (3) Physical indications of a possible release; (4) Steps to be taken for public safety in the event of a gas pipeline release; and (5) Procedures to report such an event?*  
Assets Covered [88970 \(1,934\)](#)  
Result Notes [KPUD PA Plan Section 2.1](#)

KPUD OMM Section 3.4

Reviewed materials provided to stakeholder groups. Operator has specific materials developed for each stakeholder group audience.

27. Question Result, ID, References Sat, PD.PA.LOCATIONMESSAGE.R, 192.616(e) (192.616(f))  
Question Text *Were messages developed and delivered to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations?*  
Assets Covered 88970 (1,934)  
Result Notes Reviewed KPUD Pipeline Safety Communication notice that is sent out to affected public. There are not affected municipalities, school districts, or businesses near the pipeline.
28. Question Result, ID, References Sat, PD.PA.MESSAGEFREQUENCY.R, 192.616(c) (API RP 1162 Table 2-1, API RP 1162 Table 2-2, API RP 1162 Table 2-3)  
Question Text *Did the delivery of materials and messages meet or exceed the baseline delivery frequencies specified in API RP 1162, Table 2-1 through Table 2.3?*  
Assets Covered 88970 (1,934)  
Result Notes KPUD PA Manual Section 7.

Reviewed records of materials sent in 2020. Most were sent via e-mail.

29. Question Result, ID, References Sat, EP.ERG.LIAISON.R, 192.605(a) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), ADB-05-03) (also presented in: EP.ERG)  
Question Text *Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?*  
Assets Covered 88970 (1,934)  
Result Notes Reviewed Public Awareness Outreach for 2018-2020. The town of Roosevelt has no police department or public works department. Klickitat County Public Works (Goldendale) maintains roads. The fire district #9 is a volunteer department with no paid staff. Klickitat County Sheriff's office is local LE agency. Klickitat County Fire Protection District #2 (Town of Bickleton). Section 2.2 of KPUD OMM is procedure. Confirmed contacts in 2020, attempted to sponsor training events but unable to due to Covid pandemic. 2021, met with Chief Justin Bentley (Klickitat County Fire District #9). Provided information about the pipeline.
30. Question Result, ID, References Sat, PD.PA.LANGUAGE.P, 192.616(g) (API RP 1162 Section 2.3.1)  
Question Text *Does the program require that materials and messages be provided in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?*  
Assets Covered 88970 (1,934)  
Result Notes KPUD PA Manual Section 9.2
31. Question Result, ID, References NA, PD.PA.LANGUAGE.R, 192.616(g) (API RP 1162 Section 2.3.1)  
Question Text *Were materials and messages developed and delivered in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?*  
Assets Covered 88970 (1,934)  
Result Notes No such event occurred, or condition existed, in the scope of inspection review. The local area of Roosevelt is proportionately English only.
32. Question Result, ID, References Sat, PD.PA.EVALPLAN.P, 192.616(i) (192.616(c), API RP 1162 Section 8, API RP 1162 Appendix E)  
Question Text *Does the program include a process that specifies how program implementation and effectiveness will be periodically evaluated?*  
Assets Covered 88970 (1,934)  
Result Notes KPUD PA Manual Sections 10 and 11.
33. Question Result, ID, References Sat, PD.PA.EVALIMPL.R, 192.616(c) (192.616(i), API RP 1162 Section 8.3)  
Question Text *Has an audit or review of the operator's program implementation been performed annually since the program was developed?*  
Assets Covered 88970 (1,934)

- Result Notes Reviewed 2020 Public Awareness Plan Self Assessment (conducted on 1/5/21) - No significant findings or recommended changes.
34. Question Result, ID, References Sat, PD.PA.AUDITMETHODS.R, 192.616(c) (192.616(i), API RP 1162 Section 8.3)  
 Question Text *Was one or more of the three acceptable methods (i.e., internal assessment, 3rd-party contractor review, or regulatory inspections) used to complete the annual audit or review of program implementation?*  
 Assets Covered 88970 (1,934)  
 Result Notes KPUD PA Manual Section 11.4
- Reviewed Program analysis performed by consultant Roy Rodgers on 1/5/2021. No issues or significant findings were noted.
35. Question Result, ID, References NA, PD.PA.PROGRAMIMPROVE.R, 192.616(c) (API RP 1162 Section 8.3)  
 Question Text *Were changes made to improve the program and/or the implementation process based on the results and findings of the annual audit(s)?*  
 Assets Covered 88970 (1,934)  
 Result Notes No such event occurred, or condition existed, in the scope of inspection review. No changes were needed or recommended based on annual audit performed.
36. Question Result, ID, References Sat, PD.PA.EVALEFFECTIVENESS.R, 192.616(c) (API RP 1162 Section 8.4)  
 Question Text *Have effectiveness evaluation(s) of the program been performed for all stakeholder groups in all notification areas along all systems covered by the program?*  
 Assets Covered 88970 (1,934)  
 Result Notes Effectiveness review for 2020 did not find any deficiencies. It was a difficult year to assess stakeholder effectiveness due to pandemic concerns. Operator did make progress with formalizing contact with local fire chief.
37. Question Result, ID, References Sat, PD.PA.MEASUREOUTREACH.R, 192.616(c) (API RP 1162 Section 8.4.1)  
 Question Text *In evaluating effectiveness, was actual program outreach for each stakeholder audience tracked?*  
 Assets Covered 88970 (1,934)  
 Result Notes Reviewed 2020 Public Awareness Plan effectiveness annual audit. No changes were needed based on annual review of stakeholder audience.
38. Question Result, ID, References Sat, PD.PA.MEASUREUNDERSTANDABILITY.R, 192.616(c) (API RP 1162 Section 8.4.2)  
 Question Text *In evaluating program effectiveness, was the percentage of each stakeholder audience that understood and retained the key information from the messages determined?*  
 Assets Covered 88970 (1,934)  
 Result Notes KPUD PA Plan Section 11.4
- No percentage was examined due to limited contacts and unavailability of stakeholder group interactions.
39. Question Result, ID, References Sat, PD.PA.MEASUREBEHAVIOR.R, 192.616(c) (API RP 1162 Section 8.4.3)  
 Question Text *In evaluating program effectiveness, was evaluation made of whether appropriate preventive, response, and mitigative behaviors were understood and likely to be exhibited?*  
 Assets Covered 88970 (1,934)  
 Result Notes KPUD PA Manual 11.4
40. Question Result, ID, References NA, PD.PA.MEASUREBOTTOM.R, 192.616(c) (API RP 1162 Section 8.4.4)  
 Question Text *Were bottom-line results of the program measured 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?*  
 Assets Covered 88970 (1,934)  
 Result Notes No such event occurred, or condition existed, in the scope of inspection review.

41. Question Result, ID, References **NA, PD.PA.CHANGES.R, 192.616(c) (API RP 1162 Section 2.7 (Step 12), API RP 1162 Section 8.5)**  
 Question Text *Were needed changes and/or modifications to the program identified and documented based on the results and findings of the program effectiveness evaluations?*  
 Assets Covered **88970 (1,934)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

## PD.RW: ROW Markers, Patrols, Monitoring

42. Question Result, ID, References **Sat, MO.RW.PATROL.P, 192.705(a) (192.705(b), 192.705(c))** (also presented in: MO.RW)  
 Question Text *Does the process adequately cover the requirements for patrolling the ROW and conditions reported?*  
 Assets Covered **88970 (1,934)**  
 Result Notes **KPUD OMM Procedure P-9.**
43. Question Result, ID, References **Sat, MO.RW.PATROL.R, 192.709(c) (192.705(a), 192.705(b), 192.705(c))** (also presented in: MO.RW)  
 Question Text *Do records indicate that ROW surface conditions have been patrolled as required?*  
 Assets Covered **88970 (1,934)**  
 Result Notes **Reviewed ROW patrol records for 2020: (Required to be conducted annually; operator does bi-annually). Also includes leak survey in this patrol report.**  
  
**5/26/2020 (Form F-17) Pipeline Patrol Report - No issues noted**  
  
**11/30/2020 (Form F-17) Pipeline Patrol Report - No issues note**
44. Question Result, ID, References **Sat, MO.RW.ROWMARKER.O, 192.707(a) (192.707(b), 192.707(c), 192.707(d))** (also presented in: MO.RW)  
 Question Text *Are line markers placed and maintained as required?*  
 Assets Covered **88970 (1,934)**  
 Result Notes **Reviewed line markers via Google earth and images provided by Operator. Road crossing is marked with pins driven into the pavement. Unable to physically verify due to Covid restrictions on contact with operator personnel. Reviewed line marker records (78 total markers over both lines).**
45. Question Result, ID, References **Sat, MO.RW.ROWCONDITION.O, 192.705(a) (192.705(c))** (also presented in: MO.RW)  
 Question Text *Are the ROW conditions acceptable for the type of patrolling used?*  
 Assets Covered **88970 (1,934)**  
 Result Notes **Reviewed Google map of native ROW. The only issue that presents itself is tumble weeds and tall grass that is the result of wind.**
46. Question Result, ID, References **Sat, MO.RW.ROWMARKER.P, 192.707(a) (192.707(b), 192.707(c), 192.707(d))** (also presented in: MO.RW)  
 Question Text *Does the process adequately cover the requirements for placement of ROW markers?*  
 Assets Covered **88970 (1,934)**  
 Result Notes **KPUD OMM Procedure P-21.**
47. Question Result, ID, References **NA, MO.RW.GOMHAZARD.P, 192.612(a) (192.612(c)(2), 192.612(c)(3))** (also presented in: MO.RW)  
 Question Text *Does the process require identification of pipelines in the Gulf of Mexico at risk of being exposed underwater or hazards to navigation?*  
 Assets Covered **88970 (1,934)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
48. Question Result, ID, References **NA, MO.RW.GOMHAZARD.R, 192.709(c) (192.612(a), 192.612(b))** (also presented in: MO.RW)  
 Question Text *Do records indicate steps taken to identify and inspect pipelines in the Gulf of Mexico at risk of being exposed underwater pipelines or hazards to navigation?*  
 Assets Covered **88970 (1,934)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**



49. Question Result, ID, References **NA, MO.RW.GOMHAZARD.O, 192.612(c)(2)** (also presented in: MO.RW)  
Question Text *Are pipelines in the Gulf of Mexico at risk of being exposed underwater pipelines or hazards to navigation marked as required?*  
Assets Covered **88970 (1,934)**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

## PD.SP: Special Permits

50. Question Result, ID, References **NA, PD.SP.REPAIR.P, 190.341(d)(2)**  
Question Text *If the operator operates a pipeline under a special permit have the processes been modified to incorporate the requirements of the permit for required repairs?*  
Assets Covered **88970 (1,934)**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

51. Question Result, ID, References **NA, PD.SP.BESTPRACTICE.P, 190.341(d)(2)**  
Question Text *If the operator operates a pipeline under a special permit, do the processes specify implementation of applicable CGA Best Practices?*  
Assets Covered **88970 (1,934)**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

52. Question Result, ID, References **NA, PD.SP.REPAIR.R, 190.341(d)(2)**  
Question Text *If the operator operates a pipeline under a special permit, do records indicate that required repairs were performed?*  
Assets Covered **88970 (1,934)**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

53. Question Result, ID, References **NA, PD.SP.REQUIREMENT.O, 190.341(d)(2)**  
Question Text *If the operator operates a pipeline under a special permit verify that the requirements have been implemented.*  
Assets Covered **88970 (1,934)**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

54. Question Result, ID, References **NA, PD.SP.AMAOP.P, 190.341(d)(2)**  
Question Text *If the operator operates a pipeline under an AMAOP special permit have the processes been modified to incorporate the requirements of the permit?*  
Assets Covered **88970 (1,934)**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

55. Question Result, ID, References **NA, PD.SP.AMAOP.R, 190.341(d)(2) (192.605(b))**  
Question Text *If the operator operates a pipeline under an AMAOP special permit, do records indicate that required repairs were performed?*  
Assets Covered **88970 (1,934)**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

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Report Parameters: Results: all

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