

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	8781 Ferndale TIMP Inspection	Operator(s)	FERNDALE PIPELINE SYSTEM (570)	Plan Submitted	11/06/2024
Status	LOCKED	Lead	Derek Norwood	Plan Approval	11/07/2024 by Dennis Ritter
Start Year	2024	Observer(s)	David Cullom, Lex Vinsel, Anthony Dorrough, Scott Anderson, John Trier, Marina Rathbun, Tom Green, Jason Hoxit	All Activity Start	10/21/2024
System Type	GT	Supervisor	Dennis Ritter	All Activity End	10/24/2024
Protocol Set ID	GT.2024.01	Director	Scott Rukke	Inspection Submitted	11/07/2024
				Inspection Approval	11/07/2024 by Scott Rukke

Inspection Summary

Inspection Scope and Summary

This inspection included review of Ferndale Pipeline's Integrity Management Program for years 2021 through 2023. Records were reviewed remotely via Microsoft Teams and in-person at the Renton Control Center during the standard inspection in July 2024. There was one day of field inspection which included CP, electrical isolation, ROW patrol, markers, Valves, atmospheric corrosion and odorant testing.

Facilities visited and Total AFOD

4 AFODs

Inspected from Sumas Station to BP Cherry Point and Intalco

Summary of Significant Findings

(DO NOT Discuss Enforcement options)

There were no concerns or probable violations as a result of this inspection

Primary Operator contacts and/or participants

Jim Fraley, DOT Compliance Advisor

Jim Bruen, DOT Team Leader

Scope (Assets)

Short # Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1. 88968 (91)	Ferndale Pipeline System	unit	88968	Bottle/Pipe - Holders Vault Service Line Gas Storage Field (Aboveground) Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric	401	401	401	401	100.0%

Short # Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
				Plastic Pipe AMAOP Abandoned Compressor Stations					

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

Plans

Plan # Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent Notes
1. 88968 (91)	--	AR, TD	P, R, O, S	Detail --
2. 88968 (91)	GT IM Implementation, GT IM	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, UNGS, 114, GENERIC	P, R, O, S	Detail --
3. 88968 (91)	--	MO.MCA	P, R, O, S	Detail --

Plan Implementations

# Activity Name	SMAR T Act#	Start Date	Focus Directives	Involved Groups/Subgroups	Asset Types	Qst Type(s)	Planned	Required	Inspected	Total	Required % Complete
1 GTIM Implementation	--	10/21/2024 10/24/2024	GT IM Implementation, GT IM	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, UNGS, 114, GENERIC	all assets	all types	183	183	183	183	100.0%
2 AR TD MO	--	10/21/2024 10/24/2024	--	AR, TD, MO.MCA	all assets	all types	315	315	315	315	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	Attendance	COMPLETED	11/06/2024	GTIM Implementation	88968 (91)

Results (all values, 401 results)

406 (instead of 401) results are listed due to re-presentation of questions in more than one sub-group.

AR.RCOM: Repair Criteria (O&M)

- Question Result, ID, Sat, AR.RCOM.NONCOVERED.P, 192.485(a) (192.485(b), 192.485(c), 192.703(b), 192.710, 192.711, References 192.713, 192.714)
 Question Text *Does the integrity assessment and maintenance processes include adequate criteria for determining the need for, and timeliness of, pipeline defect repairs in non-covered segments?*
 Assets Covered 88968 (91)

Result Notes Repairs, Replacements & Relocations

Procedure P192-711

Exhibit RR-1

2. Question Result, ID, NA, AR.RCOM.NONCOVERED.R, 192.485(a) (192.485(b), 192.485(c), 191.23(a)(1), 192.703(b),
References 192.710, 192.711, 192.713)
Question Text *From the review of the results of integrity assessments, did the operator repair conditions that posed a threat to pipeline integrity on Non-Covered segments?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
3. Question Result, ID, NA, AR.RCOM.REMEDIATIONOM.O, 192.485(a) (192.485(b), 192.485(c), 192.710, 192.711, 192.713)
References
Question Text *Is anomaly remediation and documentation of remediation adequate for all segments?*
Assets Covered 88968 (91)
Result Notes No such activity/condition was observed during the inspection.
4. Question Result, ID, NA, AR.RCOM.GGREMEDIATION.P, 192.485(a) (192.9(d)(2), 192.9(e)(1)(ii), 192.453, 192.485(b))
References
Question Text *Do maintenance procedures include adequate criteria for determining the need for, and timeliness of, pipeline repairs in gas gathering pipelines?*
Assets Covered 88968 (91)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
5. Question Result, ID, NA, AR.RCOM.GGREMEDIATION.R, 192.485(a) (191.23(a)(1), 191.23(b)(1), 192.9(d)(2), 192.9(e)(1)(ii),
References 192.453, 192.485(b))
Question Text *From the review of records, did the operator repair or replace pipe to permanently restore the serviceability of the pipe?*
Assets Covered 88968 (91)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
6. Question Result, ID, NA, AR.RCOM.GGREMEDIATION.O, 192.485(a) (192.453, 192.459, 192.485(b))
References
Question Text *Is operator's remediation and documentation of remediation adequate?*
Assets Covered 88968 (91)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

AR.CDA: Confirmatory Direct Assessment

7. Question Result, ID, NA, AR.CDA.CDAREVQUAL.P, 192.915(a) (192.915(b))
References
Question Text *Does the process require that operator/vendor personnel (including supervisors) who review and evaluate CDA assessment results meet appropriate training, experience, and qualification criteria?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

Ferndale Gas does not use CDA
8. Question Result, ID, NA, AR.CDA.CDAREVQUAL.R, 192.947(h) (192.915(a), 192.915(b))
References
Question Text *Do records demonstrate that operator/vendor personnel, including supervisors, who conduct assessments or review assessment results, are qualified for the tasks they perform?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

Ferndale Gas does not use CDA
9. Question Result, ID, NA, AR.CDA.CDAREVQUAL.O, 192.915(a) (192.915(b))
References

Question Text *From the observation of selected integrity assessments, are operator and vendor personnel, including supervisors, who conduct assessments or review assessment results, qualified for the tasks they perform?*

Assets Covered 88968 (91)

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

Ferndale Gas does not use CDA

10. Question Result, ID, References NA, AR.CDA.CDAPLAN.P, 192.931(a) (192.931(b), 192.931(c), 192.931(d))

Question Text *Is an adequate Confirmatory Direct Assessment Plan in place?*

Assets Covered 88968 (91)

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

Ferndale Gas does not use CDA

11. Question Result, ID, References NA, AR.CDA.CDAEXTCORR.R, 192.947(h) (192.931(b))

Question Text *Do records indicate that the external corrosion plan was properly implemented?*

Assets Covered 88968 (91)

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

Ferndale Gas does not use CDA

12. Question Result, ID, References NA, AR.CDA.CDAINTCORR.R, 192.947(h) (192.931(c))

Question Text *Do records demonstrate that the internal corrosion plan was properly implemented?*

Assets Covered 88968 (91)

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

Ferndale Gas does not use CDA

13. Question Result, ID, References NA, AR.CDA.CDAINDICATION.R, 192.947(h) (192.931(d))

Question Text *Do records demonstrate that the next assessment should have been accelerated?*

Assets Covered 88968 (91)

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

Ferndale Gas does not use CDA

14. Question Result, ID, References NA, AR.CDA.CDACORR.P, 192.933 (192.917(e)(5))

Question Text *Does the process adequately account for taking required actions to address significant corrosion threats identified using confirmatory direct assessment?*

Assets Covered 88968 (91)

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

Ferndale Gas does not use CDA

15. Question Result, ID, References NA, AR.CDA.CDACORR.R, 192.933 (192.917(e)(5))

Question Text *Do records demonstrate that required actions are being taken to address significant corrosion threats identified by CDA as required?*

Assets Covered 88968 (91)

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

Ferndale Gas does not use CDA

AR.EC: External Corrosion Direct Assessment (ECDA)

16. Question Result, ID, References **NA, AR.EC.ECDAREVQUAL.P, 192.915(a) (192.915(b))**
Question Text *Does the process require that operator/vendor personnel (including supervisors) who review and evaluate ECDA assessment results meet appropriate training, experience, and qualification criteria?*
Assets Covered **88968 (91)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

Ferndale Gas does not use ECDA
17. Question Result, ID, References **NA, AR.EC.ECDAPREASSESS.R, 192.947(g) (192.925(b)(1))**
Question Text *Do records demonstrate that the ECDA pre-assessment process complied with NACE SP0502-2010 Section 3 and 192.925(b)(1)?*
Assets Covered **88968 (91)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

Ferndale Gas does not use ECDA
18. Question Result, ID, References **NA, AR.EC.ECDAREVQUAL.R, 192.947(g) (192.915(a), 192.915(b))**
Question Text *Do records demonstrate that operator/vendor personnel, including supervisors, who conduct ECDA assessments or review and analyze assessment results are qualified for the tasks they perform?*
Assets Covered **88968 (91)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

Ferndale Gas does not use ECDA
19. Question Result, ID, References **NA, AR.EC.ECDAREVQUAL.O, 192.915(a) (192.915(b))**
Question Text *From the observation of selected integrity assessments, are operator and vendor personnel, including supervisors, who conduct assessments or review assessment results, qualified for the tasks they perform?*
Assets Covered **88968 (91)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

Ferndale Gas does not use ECDA
20. Question Result, ID, References **NA, AR.EC.ECDAPLAN.P, 192.925(a) (192.925(b))**
Question Text *Is an adequate ECDA plan and process in place for conducting ECDA?*
Assets Covered **88968 (91)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

Ferndale Gas does not use ECDA
21. Question Result, ID, References **NA, AR.EC.ECDAINTEGRATION.P, 192.917(b) (ASME B31.8S-2004 Section 4.5)**
Question Text *Is the process for integrating ECDA results with other information adequate?*
Assets Covered **88968 (91)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

Ferndale Gas does not use ECDA
22. Question Result, ID, References **NA, AR.EC.ECDAINTEGRATION.R, 192.947(g) (192.917(b))**
Question Text *Do records demonstrate that the operator integrated other data/information when evaluating data/results?*
Assets Covered **88968 (91)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

Ferndale Gas does not use ECDA

23. Question Result, ID, References **NA, AR.EC.ECDAREGION.R, 192.947(g) (192.925(b)(1))**
 Question Text *Do records demonstrate that the operator identified ECDA Regions?*
 Assets Covered **88968 (91)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
- Ferndale Gas does not use ECDA
24. Question Result, ID, References **NA, AR.EC.ECDAINDIRECT.R, 192.947(g) (192.925(b)(2))**
 Question Text *Do records demonstrate that ECDA indirect inspection process complied with NACE SP 0502-2010 Section 4 and ASME B31.8S-2004, Section 6.4?*
 Assets Covered **88968 (91)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
- Ferndale Gas does not use ECDA
25. Question Result, ID, References **NA, AR.EC.ECDADIRECT.R, 192.947(g) (192.925(b)(3))**
 Question Text *Do records demonstrate that excavations, direct examinations, and data collection were performed in accordance with NACE SP 0502-2010, Sections 5 and 6.4.2 and ASME B31.8S-2004, Section 6.4?*
 Assets Covered **88968 (91)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
- Ferndale Gas does not use ECDA
26. Question Result, ID, References **NA, AR.EC.ECDADIRECT.O, 192.925(b)(3)**
 Question Text *Were ECDA direct examinations adequately conducted?*
 Assets Covered **88968 (91)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
- Ferndale Gas does not use ECDA
27. Question Result, ID, References **NA, AR.EC.ECDAANALYSIS.R, 192.947(g) (192.925(b)(4), 192.933(b))**
 Question Text *Do records demonstrate that an analysis of the ECDA data and other information was adequate to identify areas where external corrosion activity is most likely?*
 Assets Covered **88968 (91)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
- Ferndale Gas does not use ECDA
28. Question Result, ID, References **NA, AR.EC.ECDAPLANMOC.P, 192.947(g) (192.925(b)(3)(iii), 192.911(k))**
 Question Text *Have criteria and internal notification processes been established and implemented for any changes in the ECDA plan?*
 Assets Covered **88968 (91)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
- Ferndale Gas does not use ECDA
29. Question Result, ID, References **NA, AR.EC.ECDAPLANMOC.R, 192.947(g) (192.925(b)(3)(iii))**
 Question Text *Do records demonstrate that changes in the ECDA plan have been implemented and documented?*
 Assets Covered **88968 (91)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
- Ferndale Gas does not use ECDA

30. Question Result, ID, References **NA, AR.EC.ECDAPOSTASSESS.R, 192.947(g) (192.925(b)(4))**
Question Text *Do records demonstrate that the requirements for post-assessment were met?*
Assets Covered **88968 (91)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

Ferndale Gas does not use ECDA

31. Question Result, ID, References **NA, AR.EC.ECCORR.P, 192.933 (192.917(e)(5))**
Question Text *Does the process adequately account for taking required actions to address significant external corrosion threats?*
Assets Covered **88968 (91)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

Ferndale Gas does not use ECDA

32. Question Result, ID, References **NA, AR.EC.ECCORR.R, 192.933 (192.917(e)(5))**
Question Text *Do records demonstrate that required actions are being taken to address significant external corrosion threats as required?*
Assets Covered **88968 (91)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

Ferndale Gas does not use ECDA

AR.IC: Internal Corrosion Direct Assessment (ICDA)

33. Question Result, ID, References **NA, AR.IC.ICDAPLANPRE.P, 192.927(c) (192.927(a), 192.927(b))**
Question Text *Is an ICDA plan and process in place prior to conducting the pre-assessment step of ICDA?*
Assets Covered **88968 (91)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

Ferndale Gas does not use ICDA

34. Question Result, ID, References **NA, AR.IC.ICDAPLANINDIRECT.P, 192.927(c) (192.927(a), 192.927(b))**
Question Text *Is an ICDA plan and process in place prior to conducting the indirect inspection step in the ICDA process?*
Assets Covered **88968 (91)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

Ferndale Gas does not use ICDA

35. Question Result, ID, References **NA, AR.IC.ICDAPLANEXAM.P, 192.927(c) (192.927(a), 192.927(b), 192.485, 192.712, 192.714, 192.933)**
Question Text *Is an ICDA plan and process in place prior to conducting the detailed examination step of the ICDA process?*
Assets Covered **88968 (91)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

Ferndale Gas does not use ICDA

36. Question Result, ID, References **NA, AR.IC.ICDAPLANPOST.P, 192.927(c) (192.927(a), 192.927(b), 192.478, 192.485, 192.712, 192.714, 192.933)**
Question Text *Is an ICDA plan and process in place prior to conducting the post assessment monitoring?*
Assets Covered **88968 (91)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

Ferndale Gas does not use ICDA

37. Question Result, ID, References **NA, AR.IC.ICDAPREASSESS.R, 192.947(g)**
 Question Text *Do records demonstrate that the requirements for an ICDA pre-assessment were met?*
 Assets Covered **88968 (91)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

Ferndale Gas does not use ICDA
38. Question Result, ID, References **NA, AR.IC.ICDAREGION.R, 192.947(g) (192.927(c)(2), 192.927(c)(5))**
 Question Text *Do records demonstrate that ICDA Regions were adequately identified?*
 Assets Covered **88968 (91)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

Ferndale Gas does not use ICDA
39. Question Result, ID, References **NA, AR.IC.ICDAINDIRECT.R, 192.947(g) (192.927(c)(2), 192.927(c)(5))**
 Question Text *Do records demonstrate that sites where internal corrosion may be present were properly identified?*
 Assets Covered **88968 (91)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
40. Question Result, ID, References **NA, AR.IC.ICDADIRECT.R, 192.947(g) (192.927(c)(3), 192.927(c)(5))**
 Question Text *Do records demonstrate the operator performed detailed examinations of locations identified during the Indirect Inspection?*
 Assets Covered **88968 (91)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
41. Question Result, ID, References **NA, AR.IC.ICDAPOSTASSESS.R, 192.947(g) (192.927(c)(4)(i), 192.927(c)(4)(ii), 192.927(c)(4)(iii)(A), 192.477)**
 Question Text *Do records demonstrate that the operator assessed the effectiveness of the ICDA process?*
 Assets Covered **88968 (91)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
42. Question Result, ID, References **NA, AR.IC.ICDAANALYSIS.R, 192.947(g) (192.927(c), 192.933(b))**
 Question Text *Do records demonstrate that sufficient data was used to complete the ICDA analysis to identify the internal corrosion threats to the pipeline?*
 Assets Covered **88968 (91)**
 Result Notes **Ferndale Pipeline does not use ICDA**
43. Question Result, ID, References **NA, AR.IC.ICDAPLAN.P, 192.927(c) (192.927(a), 192.927(b))**
 Question Text *Is an ICDA plan and process in place for conducting ICDA?*
 Assets Covered **88968 (91)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
44. Question Result, ID, References **NA, AR.IC.ICCORR.P, 192.933 (192.917(e)(5))**
 Question Text *Does the process adequately account for taking required actions to address significant internal corrosion threats related to internal corrosion?*
 Assets Covered **88968 (91)**
 Result Notes **Ferndale Pipeline does not use ICDA**
45. Question Result, ID, References **NA, AR.IC.ICCORR.R, 192.933 (192.917(e)(5))**
 Question Text *Do records demonstrate that required actions are being taken to address significant internal corrosion threats as required?*
 Assets Covered **88968 (91)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

46. Question Result, ID, References **NA, AR.IC.ICDAREVQUAL.P, 192.915(a) (192.915(b))**
 Question Text *Does the process require that operator/vendor personnel (including supervisors) who review and evaluate ICDA assessment results meet appropriate training, experience, and qualification criteria?*
 Assets Covered **88968 (91)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
47. Question Result, ID, References **NA, AR.IC.ICDAREVQUAL.R, 192.947(g) (192.915(a), 192.915(b))**
 Question Text *Do records demonstrate that operator/vendor personnel, including supervisors, who conduct ICDA assessments or review and analyze assessment results, are qualified for the tasks they perform?*
 Assets Covered **88968 (91)**
 Result Notes **Ferndale Pipeline does not use ICDA**
48. Question Result, ID, References **NA, AR.IC.ICDAREVQUAL.O, 192.915(a) (192.915(b))**
 Question Text *From the observation of selected integrity assessments, are operator and vendor personnel, including supervisors, who conduct assessments or review assessment results, qualified for the tasks they perform?*
 Assets Covered **88968 (91)**
 Result Notes **No such activity/condition was observed during the inspection.**

AR.SCC: Stress Corrosion Cracking Direct Assessment (SCCDA)

49. Question Result, ID, References **NA, AR.SCC.SCCDAPLANPRE.P, 192.929(b) (, , , , ,)**
 Question Text *Does the SCCDA plan include requirements for preassessment?*
 Assets Covered **88968 (91)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

Ferndale Gas does not use SCCDA
50. Question Result, ID, References **NA, AR.SCC.SCCDAPLANINDIRECT.P, 192.929(b) (192.929(b)(2), , , , ,)**
 Question Text *Is an adequate SCCDA plan developed prior to indirect inspections?*
 Assets Covered **88968 (91)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

Ferndale Gas does not use SCCDA
51. Question Result, ID, References **NA, AR.SCC.SCCDAPLANDIRECT.P, 192.929(b) (192.929(b)(3), , , , ,)**
 Question Text *Is an adequate plan developed prior to performing SCCDA?*
 Assets Covered **88968 (91)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
52. Question Result, ID, References **NA, AR.SCC.SCCDAPLANPOST.P, 192.929(b) (192.929(b)(5))**
 Question Text *Is an adequate SCCDA plan developed prior to post assessment requirements?*
 Assets Covered **88968 (91)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
53. Question Result, ID, References **NA, AR.SCC.SCCDAMITIG.P, 192.929(b)(4) (NACE SP0204, Section 5.5.1, 6.1.2 and 6.2.1, ASME B31.8S, Appendix A3 and A3.4)**
 Question Text *Is an adequate plan developed for remediating and mitigating SCC once discovered?*
 Assets Covered **88968 (91)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
54. Question Result, ID, References **NA, AR.SCC.SCCDADATA.R, 192.947(g) (192.929(b)(1))**

Question Text *Do records demonstrate that data was collected and evaluated?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

55. Question Result, ID, References NA, AR.SCC.SCCDAINSPECTION.R, 192.947(g) (192.929(b)(2))
Question Text *Do records demonstrate that at least two Indirect Inspections were conducted using complementary measurement tools appropriate for the pipeline segment?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

56. Question Result, ID, References NA, AR.SCC.SCCDAEXAM.R, 192.947(g) (192.929(b)(3))
Question Text *Do records demonstrate that a minimum of three direct examinations for SCC were performed within the covered pipeline segment?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

57. Question Result, ID, References NA, AR.SCC.SCCDAMITIG.R, 192.947(g) (192.929(b)(4), NACE SP0204, Section 5.5.1, 6.1.2, and 6.2.1, ASME B31.8S, Appendix A3 and A3.4)
Question Text *Do records demonstrate that the operator mitigated the threat of SCC, if found?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

58. Question Result, ID, References NA, AR.SCC.SCCDAMETHOD.O, 192.929
Question Text *From field observations, was SCCDA performed in accordance with 192.929 and the SCCDA plan?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

59. Question Result, ID, References NA, AR.SCC.SCCDANEARNEUTRAL.R, 192.947(g) (192.929(b))
Question Text *From the review of the results of selected integrity assessments, was the pipeline evaluated for near neutral SCC?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

60. Question Result, ID, References NA, AR.SCC.SCCDAREASSESSINTRVL.R, 192.947(d) (192.939(a)(3))
Question Text *From the review of the results of selected integrity assessments, did the operator determine a reassessment interval based on SCCDA results?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

61. Question Result, ID, References NA, AR.SCC.SCCCORR.P, 192.933 (192.917(e)(5))
Question Text *Does the process adequately account for taking required actions to address significant corrosion threats found following SCCDA?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

62. Question Result, ID, References NA, AR.SCC.SCCCORR.R, 192.933 (192.917(e)(5))
Question Text *Do records demonstrate that required actions are being taken to address significant corrosion threats as required following SCCDA?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

63. Question Result, ID, References NA, AR.SCC.SCCDAREVQUAL.P, 192.915(a) (192.915(b))
Question Text *Does the process require that operator/vendor personnel (including supervisors) who review and evaluate SCCDA assessment results meet appropriate training, experience, and qualification criteria?*

Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

64. Question Result, ID, References NA, AR.SCC.SCCDAREVQUAL.R, 192.947(e) (192.915(a), 192.915(b))
Question Text *Do records demonstrate that operator/vendor personnel, including supervisors, who conduct assessments or review assessment results, are qualified for the tasks they perform?*

Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

65. Question Result, ID, References NA, AR.SCC.SCCDAREVQUAL.O, 192.915(a) (192.915(b))
Question Text *From the observation of selected integrity assessments, are operator and vendor personnel, including supervisors, who conduct assessments or review assessment results, qualified for the tasks they perform?*

Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

AR.IL: In-Line Inspection (Smart Pigs)

66. Question Result, ID, References Sat, AR.IL.ILIREVIEWQUAL.P, 192.915(a) (192.915(b), 192.493)
Question Text *Does the process require that operator/vendor personnel (including supervisors) who review and evaluate ILI assessment results meet appropriate training, experience, and qualification criteria?*

Assets Covered 88968 (91)
Result Notes USPL-GP 32-0201 Requirements For ILI Projects Section 6.8 Data Evaluation

67. Question Result, ID, References NA, AR.IL.ILIREVIEWQUAL.R, 192.947(g) (192.915(a), 192.915(b), 192.493)
Question Text *Do records demonstrate that personnel who conduct assessments or review assessment results are qualified per the process requirements?*

Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

68. Question Result, ID, References NA, AR.IL.ILIREVIEWQUAL.O, 192.915(a) (192.915(b), 192.493)
Question Text *From the observation of selected integrity assessments, are operator and vendor personnel, including supervisors, who conduct assessments or review assessment results, qualified for the tasks they perform?*

Assets Covered 88968 (91)
Result Notes No such activity/condition was observed during the inspection.

69. Question Result, ID, References Sat, AR.IL.ILISPECS.P, 192.921(a)(1) (192.933(b), 192.493, 192.18)
Question Text *Does the process assure complete and adequate vendor ILI specifications?*

Assets Covered 88968 (91)
Result Notes USPL-GP 32-0201 Requirements For ILI Projects Section 6.1 In-Line Inspection Tool Run Preparation

70. Question Result, ID, References NA, AR.IL.ILISPECS.R, 192.947(g) (192.933(b), 192.493)
Question Text *Do records demonstrate that the ILI specifications were complete and adequate?*

Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

71. Question Result, ID, References Sat, AR.IL.ASSESSMETHOD.P, 192.919(b) (192.921(a), 192.937(c), 192.917, 192.493, 192.506)
Question Text *Does the process specify the assessment methods that are appropriate for the pipeline specific integrity threats?*

Assets Covered 88968 (91)
Result Notes P-192.901f Continuous Evaluation and Assessment Section D

72. Question Result, ID, References **NA, AR.IL.ASSESMETHOD.R, 192.947 (192.919(b), 192.921(a), 192.937(c))**
 Question Text *Do records demonstrate that the assessment methods shown in the baseline and/or continual assessment plan were appropriate for the pipeline specific integrity threats?*
 Assets Covered **88968 (91)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
73. Question Result, ID, References **Sat, AR.IL.ILIVALIDATE.P, 192.921(a)(1) (192.937(c), 192.493)**
 Question Text *Does the process for validating ILI results ensure that accurate integrity assessment results are obtained?*
 Assets Covered **88968 (91)**
 Result Notes **USPL-GP 32-0200 ILI Data Evaluation & Resulting Repair Program, Section 8.3 ILI Final Report &QA/QC**
74. Question Result, ID, References **NA, AR.IL.ILIVALIDATE.R, 192.947 (192.921(a)(1), 192.493)**
 Question Text *Do records demonstrate that the operator has validated ILI assessment results per their process?*
 Assets Covered **88968 (91)**
 Result Notes **No ILI or digs during this inspection period**
75. Question Result, ID, References **NA, AR.IL.ILIVALIDATE.O, 192.921(a)(1) (192.493)**
 Question Text *From observation of field activities, do the employees and vendors validate ILI assessment results per their process?*
 Assets Covered **88968 (91)**
 Result Notes **No such activity/condition was observed during the inspection.**
76. Question Result, ID, References **Sat, AR.IL.ILIINTEGRATION.P, 192.917(b) (192.493)**
 Question Text *Is the process for integrating ILI results with other information adequate?*
 Assets Covered **88968 (91)**
 Result Notes **USPL-GP 32-0200 ILI Data Evaluation & Resulting Repair Program Section 8.4**
77. Question Result, ID, References **NA, AR.IL.ILIINTEGRATION.R, 192.947 (192.917(b), 192.493)**
 Question Text *Do records demonstrate that the operator integrated other data/information when evaluating tool data/results?*
 Assets Covered **88968 (91)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
78. Question Result, ID, References **Sat, AR.IL.ILIACCEPCRITERIA.P, 192.921(a) (192.493)**
 Question Text *Is the process for ILI survey acceptance criteria adequate to assure an effective assessment?*
 Assets Covered **88968 (91)**
 Result Notes **USPL-GP 32-0201 Requirements For ILI Projects Section 6.3 Site Completion Report and Data Quality**

Section 6.4 Inspection Coverage and Determination of a Re-Run
79. Question Result, ID, References **NA, AR.IL.ILIACCEPCRITERIA.R, 192.947 (192.921(a), 192.493)**
 Question Text *Do records indicate adequate implementation of the process for ILI survey acceptance?*
 Assets Covered **88968 (91)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
80. Question Result, ID, References **NA, AR.IL.ILIDELAY.R, 192.947(d) (192.909(a), 192.909(b), 192.943(a), 192.943(b), 190.341, 192.18)**
 Question Text *Do records indicate that the performance of integrity assessments has been delayed and integrity assessment delays have been justified?*
 Assets Covered **88968 (91)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
81. Question Result, ID, References **NA, AR.IL.ILIIMPLEMENT.O, 192.921(a)(1) (192.620(d), 192.605(b), 192.493)**

Question Text *Are O&M and IMP procedural requirements for the performance of ILI assessments followed?*

Assets Covered 88968 (91)

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

82. Question Result, ID, References Sat, AR.IL.ILCORR.P, 192.933 (192.917(e)(5))

Question Text *Does the process adequately account for taking required actions to address significant corrosion threats identified during in-line inspections?*

Assets Covered 88968 (91)

Result Notes USPL-GP 32-0200 ILI Data Evaluation & Resulting Repair Program Section 7.3 Excavation and Inspection or Repair Criteria for Gas Pipeline

Section 7 Table Summary of Schedule Requirements for HCA and Non-HCA Conditions

83. Question Result, ID, References NA, AR.IL.ILCORR.R, 192.933 (192.917(e)(5))

Question Text *Do records demonstrate that required actions are being taken to address significant corrosion threats identified during in-line inspections?*

Assets Covered 88968 (91)

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

AR.LSR: Low Stress Reassessment

84. Question Result, ID, References NA, AR.LSR.LSRPLAN.P, 192.941 (192.919, 192.921, 192.941(b), 192.941(c))

Question Text *Is the process for performing low stress reassessment adequate?*

Assets Covered 88968 (91)

Result Notes BP NA does not use Low Stress Reassessment.

85. Question Result, ID, References NA, AR.LSR.LSRBA.R, 192.947(d) (192.919(c), 192.921(d), 192.941(a), 192.506)

Question Text *Do records demonstrate that a baseline assessment meeting the requirements of 192.919 and 192.921 was performed prior to performing a low stress reassessment?*

Assets Covered 88968 (91)

Result Notes BP NA does not use Low Stress Reassessment.

86. Question Result, ID, References NA, AR.LSR.LSREXTCORR.R, 192.947(d) (192.941(b))

Question Text *Do records demonstrate that the requirements of §192.941(b) were implemented when performing low stress reassessment for external corrosion?*

Assets Covered 88968 (91)

Result Notes BP NA does not use Low Stress Reassessment.

87. Question Result, ID, References NA, AR.LSR.LSRINTCORR.R, 192.947(d) (192.941(c))

Question Text *Do records demonstrate that the requirements of §192.941(c) were implemented when performing low stress reassessment for internal corrosion?*

Assets Covered 88968 (91)

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

88. Question Result, ID, References NA, AR.LSR.LSRCORR.P, 192.933 (192.917(e)(5))

Question Text *Does the process adequately account for taking required actions to address significant corrosion threats following a LSR?*

Assets Covered 88968 (91)

Result Notes BP NA does not use Low Stress Reassessment.

89. Question Result, ID, References NA, AR.LSR.LSRCORR.R, 192.933 (192.917(e)(5))

Question Text *Do records demonstrate that required actions are being taken to address significant corrosion threats as required following a LSR?*

Assets Covered 88968 (91)

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

AR.PTI: Integrity Assessment Via Pressure Test

90. Question Result, ID, References NA, AR.PTI.PRESSTESTREVQUAL.P, 192.915(a) (192.915(b), 192.921(a)(4))
Question Text *Does the process require that operator/vendor personnel (including supervisors) who review and evaluate pressure test assessment results meet appropriate training, experience, and qualification criteria?*
Assets Covered 88968 (91)
Result Notes Ferndale Gas has not used pressure tests for integrity assessments
91. Question Result, ID, References NA, AR.PTI.PRESSTESTREVQUAL.R, 192.947(g) (192.915(a), 192.915(b))
Question Text *Do records demonstrate that operator/vendor personnel, including supervisors, who conduct or review pressure test assessment results are qualified for the tasks they perform?*
Assets Covered 88968 (91)
Result Notes Ferndale Gas has not used pressure tests for integrity assessments
92. Question Result, ID, References NA, AR.PTI.PRESSTESTACCEP.P, 192.503(a) (192.503(b), 192.503(c), 192.503(d), 192.505(a), 192.505(b), 192.505(c), 192.505(d), 192.507(a), 192.507(b), 192.507(c), 192.513(a), 192.513(b), 192.513(c), 192.513(d), 192.921(a)(2))
Question Text *Were test acceptance criteria and processes sufficient to assure the basis for an acceptable pressure test?*
Assets Covered 88968 (91)
Result Notes Ferndale Gas has not used pressure tests for integrity assessments
93. Question Result, ID, References NA, AR.PTI.PRESSTESTRESULT.R, 192.517(a) (192.505(a), 192.505(b), 192.505(c), 192.505(d), 192.507(a), 192.507(b), 192.507(c), 192.513(a), 192.513(b), 192.513(c), 192.513(d), 192.517(b), 192.617, 192.619(a), 192.919(e), 192.921(a)(2))
Question Text *Do the test records validate the pressure test?*
Assets Covered 88968 (91)
Result Notes Ferndale Gas has not used pressure tests for integrity assessments
94. Question Result, ID, References NA, AR.PTI.PRESSTESTCOMPLETE.O, 192.503(a) (192.503(b), 192.503(c), 192.503(d), 192.505(a), 192.505(b), 192.505(c), 192.505(d), 192.507(a), 192.507(b), 192.507(c), 192.513(a), 192.513(b), 192.513(c), 192.513(d))
Question Text *From field operations was the pressure test performed in accordance with Subpart J requirements and the process requirements?*
Assets Covered 88968 (91)
Result Notes Ferndale Gas has not used pressure tests for integrity assessments
95. Question Result, ID, References NA, AR.PTI.PTICORR.P, 192.933 (192.917(e)(5))
Question Text *Does the process adequately account for taking required actions to address significant corrosion threats?*
Assets Covered 88968 (91)
Result Notes Ferndale Gas has not used pressure tests for integrity assessments
96. Question Result, ID, References NA, AR.PTI.PTICORR.R, 192.933 (192.917(e)(5))
Question Text *Do records demonstrate that required actions are being taken to address significant corrosion threats as required?*
Assets Covered 88968 (91)
Result Notes Ferndale Gas has not used pressure tests for integrity assessments
97. Question Result, ID, References NA, AR.PTI.SPIKEHYDRO.P, 192.506(a) (192.505, 192.710(c)(3), 192.921(a)(3))
Question Text *Do the procedures for selecting pipeline assessment methods specifically include spike hydrotests as the assessment method for detecting time-dependent threats?*
Assets Covered 88968 (91)
Result Notes Ferndale Gas has not used pressure tests for integrity assessments

98. Question Result, ID, References **NA, AR.PTI.SPIKEHYDRO.R, 192.506(a) (192.505, 192.710(c)(3), 192.921(a)(3))**
Question Text *Where time-dependent threats were an identified risk, do the records indicate that a spike hydrotest was performed to "clear" any cracks that might otherwise grow during pressure reductions after the hydrostatic test?*
Assets Covered **88968 (91)**
Result Notes **Ferndale Gas has not used pressure tests for integrity assessments**

AR.OT: Other Technology

99. Question Result, ID, References **NA, AR.OT.OTPLAN.P, 192.921(a)(7) (192.18)**
Question Text *Has a process been developed for "other technologies" that provide an equivalent understanding of the condition of the pipe?*
Assets Covered **88968 (91)**
Result Notes **Ferndale Gas has not used Other Technologies for integrity assessments**
100. Question Result, ID, References **NA, AR.OT.OTPLAN.R, 192.947(d) (192.921(a)(7), 192.933(b))**
Question Text *Do records demonstrate that the assessments were performed in accordance with the process and vendor recommendations and that defects were identified and categorized within 180 days, if applicable?*
Assets Covered **88968 (91)**
Result Notes **Ferndale Gas has not used Other Technologies for integrity assessments**
101. Question Result, ID, References **NA, AR.OT.OTREVQUAL.P, 192.915(a) (192.915(b), 192.921(a)(7), 192.493)**
Question Text *Does the process require that operator/vendor personnel (including supervisors) who review and evaluate assessment results meet acceptable qualification standards?*
Assets Covered **88968 (91)**
Result Notes **Ferndale Gas has not used Other Technologies for integrity assessments**
102. Question Result, ID, References **NA, AR.OT.OTREVQUAL.R, 192.947(d) (192.915(a), 192.915(b))**
Question Text *Do records demonstrate that operator/vendor personnel, including supervisors, who conduct assessments or review assessment results are qualified for the tasks they perform?*
Assets Covered **88968 (91)**
Result Notes **Ferndale Gas has not used Other Technologies for integrity assessments**
103. Question Result, ID, References **NA, AR.OT.OTREVQUAL.O, 192.915(a) (192.915(b))**
Question Text *From the observation of selected integrity assessments, are operator and vendor personnel, including supervisors, who conduct assessments or review assessment results, qualified for the tasks they perform?*
Assets Covered **88968 (91)**
Result Notes **Ferndale Gas has not used Other Technologies for integrity assessments**
104. Question Result, ID, References **NA, AR.OT.OTPLAN.O, 192.921(a)(7)**
Question Text *Were assessments conducted using "other technology" adequately performed in accordance with the OT process?*
Assets Covered **88968 (91)**
Result Notes **Ferndale Gas has not used Other Technologies for integrity assessments**
105. Question Result, ID, References **NA, AR.OT.OTCORR.P, 192.933 (192.917(e)(5))**
Question Text *Does the process adequately account for taking required actions to address significant corrosion threats identified using Other Technology?*
Assets Covered **88968 (91)**
Result Notes **Ferndale Gas has not used Other Technologies for integrity assessments**
106. Question Result, ID, References **NA, AR.OT.OTCORR.R, 192.933 (192.917(e)(5))**

Question Text *Do records demonstrate that required actions are being taken to address significant corrosion threats as required following the use of Other Technology?*

Assets Covered 88968 (91)

Result Notes Ferndale Gas has not used Other Technologies for integrity assessments

AR.PFP: Predicted Failure Pressure

107. Question Result, ID, References Sat, AR.PFP.ANOMALYMETALLOSS.P, 192.605 (192.607, 192.712(a), 192.917(b), 192.933(d), 192.485, 192.712(b))

Question Text *Do the procedures for evaluating corrosion metal loss anomalies or defects, ensure that a determination of the predicted failure pressure and the remaining life of the pipeline segment is established at the location of each anomaly or defect?*

Assets Covered 88968 (91)

Result Notes USPL STP 32-200 ILI Data Evaluation and Resulting Repair Program Procedures

Section 9.3 Criteria for Assessment of Metal Loss

Annex E Calculating External Metal Loss Corrosion Rate

108. Question Result, ID, References Sat, AR.PFP.ANOMALYDENTS.P, 192.605 (192.607, 192.712(a), 192.712(b), 192.933(d), 192.485, 192.712(c), 192.712(h))

Question Text *Do the procedures for evaluating dents and other mechanical damage anomalies or defects, ensure that a determination of the predicted failure pressure and the remaining life of the pipeline segment is established at the location of each anomaly or defect?*

Assets Covered 88968 (91)

Result Notes USPL STP 32-200 ILI Data Evaluation and Resulting Repair Program Procedures

Section 9.2 Dent Analysis

109. Question Result, ID, References Sat, AR.PFP.ANOMALYCRACKMODEL.P, 192.605 (192.607, 192.712(a), 192.712(d)(1))

Question Text *Do the procedures for evaluating cracks and crack like defects ensure that a determination of the predicted failure pressure and the remaining life of the pipeline segment is established at the location of each anomaly or defect, in accordance with §192.712(d)(1)?*

Assets Covered 88968 (91)

Result Notes USPL STP 32-200 ILI Data Evaluation and Resulting Repair Program Procedures

Section 9.6 Process for Responding to ILI Crack Tool Assessment

110. Question Result, ID, References Sat, AR.PFP.ANOMALYCRACKGROWTH.P, 192.605 (192.607, 192.712(d)(2))

Question Text *Do the procedures detail the performance of fatigue analysis and remaining life calculations for pipeline segments susceptible to cyclic fatigue or other loading conditions that could lead to fatigue crack growth?*

Assets Covered 88968 (91)

Result Notes USPL STP 32-200 ILI Data Evaluation and Resulting Repair Program Procedures

Section 9.6 Process for Responding to ILI Crack Tool Assessment

111. Question Result, ID, References Sat, AR.PFP.ANOMALYCRACKSURVIVEPT.P, 192.712(d)(3) (192.607, 192.712(a), 192.712(d)(1))

Question Text *Do procedures call for the calculation of the largest potential crack defect sizes when analyzing potential cracks that could have survived a pressure test, specifically in the absence of any in-line inspection data in accordance with §192.712(d)(3)?*

Assets Covered 88968 (91)

Result Notes USPL GMS 018-004 Seam Integrity Management Program

Appendix E Remaining Life Assumptions

112. Question Result, ID, References Sat, AR.PFP.ANOMALYDATAUSE.P, 192.605 (192.607, 192.712(e))

Question Text *Do the procedures detail the use of data when performing analyses of predicted or assumed anomalies or defects, in accordance with §192.712(e)?*

Assets Covered 88968 (91)

Result Notes USPL STP 32-200 ILI Data Evaluation and Resulting Repair Program Procedures

Section 9

113. Question Result, ID, References Sat, AR.PFP.ANOMALYRECORDS.P, 192.605 (192.607, 192.712(g))

Question Text *Do procedures detail the collection, creation and retention of records including all investigations, analyses, and other actions taken in performing analyses of predicted or assumed anomalies or defects, in accordance with 192.712(g)?*

Assets Covered 88968 (91)

Result Notes USPL STP 32-200 ILI Data Evaluation and Resulting Repair Program Procedures

Section 11 Documentation Required for ILI and Line Repair Projects

114. Question Result, ID, References Sat, AR.PFP.ANOMALYREASSESS.P, 192.605 (192.712(h))

Question Text *Do procedures detail the reassessment of anomalies when an operator used an Engineering Critical Assessment method?*

Assets Covered 88968 (91)

Result Notes USPL STP 32-200 ILI Data Evaluation and Resulting Repair Program Procedures

Section 9.10 Engineering Critical Assessments

115. Question Result, ID, References NA, AR.PFP.ANOMALYRECORDS.R, 192.712(g) (192.712(e))

Question Text *Do the records capture all investigations, analyses and other actions taken to support the analysis of predicted failure pressure in accordance with §192.712(g)?*

Assets Covered 88968 (91)

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

AR.RC: Repair Criteria (HCA)

116. Question Result, ID, References Sat, AR.RC.GENERAL.P, 192.907(a) (192.933(a))

Question Text *Do the repair procedures detail what actions must be taken to address integrity issues?*

Assets Covered 88968 (91)

Result Notes Repairs, Replacements & Relocations

Procedure P192-711

Exhibit RR-1

117. Question Result, ID, References NA, AR.RC.GENERAL.R, 192.947(a) (192.933(a))

Question Text *Do the repair records show what actions the operator took to address integrity issues?*

Assets Covered 88968 (91)

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

118. Question Result, ID, References Sat, AR.RC.PRESSUREREDUC.P, 192.907(a) (192.933(a)(1), 192.933(a)(2), 192.933(d)(1))

Question Text *Do the repair procedures require a temporary pressure reduction for making repairs in covered segments?*

Assets Covered 88968 (91)

Result Notes Repairs, Replacements & Relocations

Procedure P192-711

Section V.F and V.G Reasons and Schedule for Repair

Exhibit RR-3 Operating Pressure Reductions for Integrity Concerns

119. Question Result, ID, References **NA, AR.RC.PRESSUREREDUC.R, 192.947 (192.933(a)(1), 192.933(a)(2), 192.933(d)(1))**
Question Text *Do records demonstrate that a temporary pressure reduction was taken immediately or when a repair schedule could not be met?*
Assets Covered **88968 (91)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
120. Question Result, ID, References **Sat, AR.RC.DISCOVERY.P, 192.907 (192.933(b))**
Question Text *Do the repair procedures require properly define discovery and the required time frame for response in covered segments?*
Assets Covered **88968 (91)**
Result Notes **USPL STP 32-200 ILI Data Evaluation**

Section 7.1 Definition of Discovery

121. Question Result, ID, References **NA, AR.RC.DISCOVERY.R, 192.947 (192.933(b))**
Question Text *Do the records show that discovery was declared in the required timeframe?*
Assets Covered **88968 (91)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
122. Question Result, ID, References **Sat, AR.RC.SCHEDULE.P, 192.907(a) (192.933(c))**
Question Text *Do the repair procedures discuss remediating conditions according to a prioritization schedule in covered segments?*
Assets Covered **88968 (91)**
Result Notes **USPL STP 32-200 ILI Data Evaluation**

Section 7.5 Required Timing for Each Condition Category

123. Question Result, ID, References **NA, AR.RC.SCHEDULE.R, 192.947 (192.933(c))**
Question Text *Do records demonstrate that defects in covered segments were remediated according to a prioritization schedule?*
Assets Covered **88968 (91)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
124. Question Result, ID, References **Sat, AR.RC.IMMEDIATE.P, 192.907 (192.933(d)(1))**
Question Text *Do the repair procedures cover all of the elements for making immediate repairs in covered segments?*
Assets Covered **88968 (91)**
Result Notes **USPL STP 32-200 ILI Data Evaluation**

Section 7.3 Excavation and Inspection or Repair Criteria for Gas Pipelines

Subsection A Category 1 Conditions

125. Question Result, ID, References **NA, AR.RC.IMMEDIATE.R, 192.947 (192.933(d)(1))**
Question Text *Do records demonstrate that all conditions requiring immediate repair were repaired immediately upon discovery?*
Assets Covered **88968 (91)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
126. Question Result, ID, References **Sat, AR.RC.ONEYEAR.P, 192.907 (192.933(d)(2))**

Question Text *Do the repair procedures cover all of the elements for making repairs in covered segments for One-year conditions?*

Assets Covered 88968 (91)

Result Notes USPL STP 32-200 ILI Data Evaluation

Section 7.3 Excavation and Inspection or Repair Criteria for Gas Pipelines

Subsection D Category 4 Conditions

127. Question Result, ID, References NA, AR.RC.ONEYEAR.R, 192.947 (192.712, 192.933(d)(2))

Question Text *Do records demonstrate that all conditions meeting the one-year condition requirements were repaired within one year of discovery?*

Assets Covered 88968 (91)

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

128. Question Result, ID, References Sat, AR.RC.MONITOR.P, 192.907 (192.933(d)(3))

Question Text *Do the repair procedures require the operator to record and monitor conditions that meet monitoring criteria in covered segments?*

Assets Covered 88968 (91)

Result Notes USPL STP 32-200 ILI Data Evaluation

Section 7.3 Excavation and Inspection or Repair Criteria for Gas Pipelines

Subsection G Category 7 Conditions

129. Question Result, ID, References NA, AR.RC.MONITOR.R, 192.947 (192.712, 192.933(d)(3))

Question Text *Do records demonstrate that all defects were properly categorized?*

Assets Covered 88968 (91)

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

130. Question Result, ID, References Sat, AR.RC.CRACK.P, 192.907 (192.933(e))

Question Text *Do the repair procedures require the operator to perform direct examinations of known locations of cracks or crack-like defects?*

Assets Covered 88968 (91)

Result Notes USPL GP 32-199 ILI Field Inspection Protocol

Section 7.3.1.4 "The entire surface shall be inspected by wet magnetic particle method"

USPL STP 32-200 ILI Data Evaluation

Section 9.6

131. Question Result, ID, References NA, AR.RC.CRACK.R, 192.947 (192.933(e))

Question Text *Do the records show that the operator performed direct examinations of known locations of cracks or crack-like defects?*

Assets Covered 88968 (91)

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

132. Question Result, ID, References NA, AR.RC.REMEDIATION.O, 192.933

Question Text *Is anomaly remediation adequate for the covered segments being observed?*

Assets Covered 88968 (91)

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

133. Question Result, ID, References Sat, AR.RC.CRITERIATEMP.P, 192.605(b)(1) (192.711(a))

Question Text *Do the repair procedures require the operator to take immediate temporary measures to protect the public?*

Assets Covered 88968 (91)

Result Notes Repairs Replacement s and Relocation

Procedure P192.711 Section IX Temporary Repairs

134. Question Result, ID, NA, AR.RC.CRITERIATEMP.R, 192.709 (192.711(a))
References

Question Text *Do the records show that the operator took immediate temporary measures to protect the public?*

Assets Covered 88968 (91)

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

135. Question Result, ID, Sat, AR.RC.CRITERIAPERM.P, 192.605(b)(1) (192.711(b))
References

Question Text *Do the repair procedures require the operator to make permanent repairs?*

Assets Covered 88968 (91)

Result Notes Repairs Replacement s and Relocation

Procedure P192.711 Section VIII Permanent Pipeline Repairs

136. Question Result, ID, NA, AR.RC.CRITERIAPERM.R, 192.709 (192.711(b))
References

Question Text *Do the records show that the operator made permanent repairs on both non-integrity management and integrity management segments of the pipeline?*

Assets Covered 88968 (91)

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

137. Question Result, ID, Sat, AR.RC.CRITERIAWELD.P, 192.605(b)(1) (192.711(c))
References

Question Text *Do the repair procedures prohibit the operator from using welded patches?*

Assets Covered 88968 (91)

Result Notes Repairs Replacement s and Relocation

Procedure P192.711 Section VIII Permanent Pipeline Repairs

Subsection C.10 "Company shall not utilize spot welding or welded patch as a pipe repair method"

138. Question Result, ID, NA, AR.RC.CRITERIAWELD.R, 192.709 (192.711(c))
References

Question Text *Do the records show that the operator made repairs using welded patches?*

Assets Covered 88968 (91)

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

139. Question Result, ID, NA, AR.RC.CRITERIAOBSERVE.O, 192.711
References

Question Text *Is the anomaly remediation adequate for segment being observed?*

Assets Covered 88968 (91)

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

AR.RCNONHCA: Repair Criteria (Non-HCA)

140. Question Result, ID, Sat, AR.RCNONHCA.GENERAL.P, 192.605(a) (192.714(a), 192.714(b), 192.714(h))
References

Question Text *Do the repair procedures detail making repairs in a safe manner in non-covered segments?*

Assets Covered 88968 (91)

Result Notes Repairs Replacements and Relocation

P192.711 Section I Safety

141. Question Result, ID, References **NA, AR.RCNONHCA.GENERAL.R, 192.714(b) (192.714(h))**
 Question Text *Do records demonstrate that repairs were made in a safe manner in non-covered segments?*
 Assets Covered **88968 (91)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
142. Question Result, ID, References **Sat, AR.RCNONHCA.SCHEDULE.P, 192.605 (192.714(c), 192.714(h))**
 Question Text *Do the repair procedures discuss remediating conditions according to a prioritization schedule in non-covered segments?*
 Assets Covered **88968 (91)**
 Result Notes **USPL STP 32-200 ILI Data Evaluation**
- Section 7.5 Required Timing for Each Condition Category**
- Table 3 has columns for HCA and Non-HCA assets**
143. Question Result, ID, References **NA, AR.RCNONHCA.SCHEDULE.R, 192.714(c) (192.105, 192.714(h))**
 Question Text *Do records demonstrate that defects in non-covered segments were remediated according to a prioritization schedule?*
 Assets Covered **88968 (91)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
144. Question Result, ID, References **Sat, AR.RCNONHCA.IMMEDIATE.P, 192.605 (192.714(d)(1), 192.714(h))**
 Question Text *Do the repair procedures cover all of the elements for making immediate repairs in non-covered segments?*
 Assets Covered **88968 (91)**
 Result Notes **USPL STP 32-200 ILI Data Evaluation**
- Section 7.3 Excavation and Inspection or Repair Criteria for Gas Pipelines**
- Subsection A Category 1 Conditions**
145. Question Result, ID, References **NA, AR.RCNONHCA.IMMEDIATE.R, 192.714(d)(1) (192.712, 192.714(h))**
 Question Text *Do records demonstrate that all conditions requiring immediate repair were repaired immediately upon discovery?*
 Assets Covered **88968 (91)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
146. Question Result, ID, References **Sat, AR.RCNONHCA.TWOYEAR.P, 192.605 (192.714(d)(2), 192.714(h))**
 Question Text *Do the repair procedures cover all of the elements for making repairs in non covered segments for Two-year conditions?*
 Assets Covered **88968 (91)**
 Result Notes **USPL STP 32-200 ILI Data Evaluation**
- Section 7.3 Excavation and Inspection or Repair Criteria for Gas Pipelines**
- Subsection G Category 7 Conditions**
147. Question Result, ID, References **NA, AR.RCNONHCA.TWOYEAR.R, 192.714(d)(2) (192.712, 192.714(h))**
 Question Text *Do records demonstrate that all conditions meeting the two-year condition requirements were repaired within two years of discovery?*
 Assets Covered **88968 (91)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

148. Question Result, ID, References **Sat, AR.RCNONHCA.MONITOR.P, 192.605 (192.714(d)(3), 192.714(h))**
 Question Text *Do the repair procedures require the operator to record and monitor conditions that meet monitoring criteria in non covered segments?*
 Assets Covered **88968 (91)**
 Result Notes **USPL STP 32-200 ILI Data Evaluation**
- Section 7.3 Excavation and Inspection or Repair Criteria for Gas Pipelines**
- Subsection G Category 7 Conditions**
149. Question Result, ID, References **NA, AR.RCNONHCA.MONITOR.R, 192.714(d)(3) (192.712, 192.714(h))**
 Question Text *Do records demonstrate that all defects were properly categorized?*
 Assets Covered **88968 (91)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
150. Question Result, ID, References **Sat, AR.RCNONHCA.PRESSUREREDUC.P, 192.605 (192.714(e), 192.714(h))**
 Question Text *Do the repair procedures require a temporary pressure reduction for making repairs in non-covered segments?*
 Assets Covered **88968 (91)**
 Result Notes **Repairs, Replacements & Relocations**
- Procedure P192-711**
- Section V.F and V.G Reasons and Schedule for Repair**
- Exhibit RR-3 Operating Pressure Reductions for Integrity Concerns**
151. Question Result, ID, References **NA, AR.RCNONHCA.PRESSUREREDUC.R, 192.714(e) (192.714(h))**
 Question Text *Do records demonstrate that a temporary pressure reduction was taken immediately or when a repair schedule could not be met?*
 Assets Covered **88968 (91)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
152. Question Result, ID, References **Sat, AR.RCNONHCA.OTHER.P, 192.605 (192.714(f), 192.714(h))**
 Question Text *Do the repair procedures require the operator to take appropriate remedial action for other conditions that could affect safe operations in non-covered segments?*
 Assets Covered **88968 (91)**
 Result Notes **USPL STP 32-200 ILI Data Evaluation and Resulting Repair Program**
- Section 7.3 Excavation and Inspection or Repair Criteria for Gas Pipeline**
- Subsection E and F Other Conditions**
153. Question Result, ID, References **NA, AR.RCNONHCA.OTHER.R, 192.714(f) (192.714(h))**
 Question Text *Do the records show that the operator took appropriate remedial action for other conditions that could affect safe operations in non-covered segments?*
 Assets Covered **88968 (91)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
154. Question Result, ID, References **Sat, AR.RCNONHCA.CRACK.P, 192.605 (192.714(g), 192.714(h))**
 Question Text *Do the repair procedures require the operator to perform direct examinations of known locations of cracks or crack-like defects?*
 Assets Covered **88968 (91)**

Result Notes USPL GP 32-199 ILI Field Inspection Protocol

Section 7.3.1.4 "The entire surface shall be inspected by wet magnetic particle method"

USPL STP 32-200 ILI Data Evaluation

Section 9.6

155. Question Result, ID, References **NA, AR.RCNONHCA.CRACK.R, 192.714(g) (192.714(h))**
Question Text *Do the records show that the operator performed direct examinations of known locations of cracks or crack-like defects?*
Assets Covered **88968 (91)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
156. Question Result, ID, References **NA, AR.RCNONHCA.REMEDIATION.O, 192.714**
Question Text *Is anomaly remediation adequate for the non-covered segments being observed?*
Assets Covered **88968 (91)**
Result Notes **No such activity/condition was observed during the inspection.**

AR.RMP: Repair Methods and Practices

157. Question Result, ID, References **Sat, AR.RMP.SAFETY.P, 192.605(b)(9) (192.713(b))**
Question Text *Does the process ensure that repairs are made in a safe manner and are made so as to prevent damage to persons and property?*
Assets Covered **88968 (91)**
Result Notes **Repairs Replacements and Relocation**

P192.711 Section I Safety
158. Question Result, ID, References **NA, AR.RMP.SAFETY.O, 192.605(b)(9) (192.713(b))**
Question Text *Are repairs made in a safe manner and to prevent damage to persons and property?*
Assets Covered **88968 (91)**
Result Notes **No such activity/condition was observed during the inspection.**
159. Question Result, ID, References **Sat, AR.RMP.IGNITION.P, 192.605(b)(1) (192.751(a), 192.751(b), 192.751(c))**
Question Text *Is there a process for preventing accidental ignition where gas presents a hazard of fire or explosion?*
Assets Covered **88968 (91)**
Result Notes **Protections Against Ignitions**

Procedure P192.751
160. Question Result, ID, References **Sat, AR.RMP.IGNITION.R, 192.751(a) (192.751(b), 192.751(c))**
Question Text *Do records indicate adequate steps were taken by the operator to prevent accidental ignition prior to performing work?*
Assets Covered **88968 (91)**
Result Notes **Reviewed a sample of Permit to Work Form**

Form indicates if there is any hazard related to ignition of gas and mitigation techniques
161. Question Result, ID, References **NA, AR.RMP.IGNITION.O, 192.751(a) (192.751(b), 192.751(c))**
Question Text *Perform observations of selected locations to verify that adequate steps have been taken by the operator to minimize the potential for accidental ignition.*
Assets Covered **88968 (91)**

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

162. Question Result, ID, References Sat, AR.RMP.HOTTAP.P, 192.605(b)(1) (192.627)
Question Text *Is the process adequate for tapping pipelines under pressure?*
Assets Covered 88968 (91)
Result Notes Repairs Replacements and Relocation

P192.711 Section I Safety

Section XII Hot Tap & Stopple Procedures
163. Question Result, ID, References NA, AR.RMP.HOTTAP.R, 192.627 (192 Subpart N)
Question Text *From a review of selected records, were the personnel who performed pressure taps on pipelines under pressure qualified?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
164. Question Result, ID, References NA, AR.RMP.HOTTAP.O, 192.627 (192 Subpart N)
Question Text *Were pressure taps on pipelines under pressure performed in accordance with processes by qualified personnel?*
Assets Covered 88968 (91)
Result Notes No such activity/condition was observed during the inspection.
165. Question Result, ID, References Sat, AR.RMP.REPAIRREQT.P, 192.605(b)(1) (192.711(a), 192.711(b), 192.711(c), 192.717(b)(3))
Question Text *Does the repair process capture the requirements of 192.711 for transmission lines?*
Assets Covered 88968 (91)
Result Notes Repairs Replacements and Relocation

Procedure P192.711 Section VIII Permanent Pipeline Repairs
166. Question Result, ID, References Sat, AR.RMP.FIELDREPAIRDEFECT.P, 192.605(b)(1) (192.713(a), 192.713(b))
Question Text *Is the process adequate for the permanent field repair of defects in transmission lines?*
Assets Covered 88968 (91)
Result Notes Repairs Replacements and Relocation

Procedure P192.711 Section VIII Permanent Pipeline Repairs
167. Question Result, ID, References NA, AR.RMP.METHOD.R, 192.709(a) (192.713(a), 192.713(b), 192.717(a), 192.717(b), ASME B31.8S-2004 Section 7)
Question Text *From the review of records, were all repairs performed in accordance with processes, applicable sections of Part 192, the guidance of ASME B31.8S-2004, Section 7, and the Pipeline Repair Manual, Revision 5?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
168. Question Result, ID, References NA, AR.RMP.REPAIRQUAL.R, 192.807(b) (192.805(h))
Question Text *From the review of selected records, were personnel performing repairs, other than welding, and post repair tests qualified for the task they performed?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
169. Question Result, ID, References Sat, AR.RMP.FIELDREPAIRWELDS.P, 192.605(b) (192.715(a), 192.715(b), 192.715(c))
Question Text *Is the process adequate for the permanent field repair of welds?*
Assets Covered 88968 (91)

Result Notes Repairs Replacements and Relocation

P192.711 Section VII Permanent Girth Weld Repair

170. Question Result, ID, NA, AR.RMP.WELDERQUAL.R, 192.225(a) (192.225(b), 192.227(a), 192.227(b), 192.229(a), 192.229(b),
References 192.229(c), 192.229(d))
Question Text *From the review of selected records, were repairs requiring welding performed by qualified welders using
qualified welding processes?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
171. Question Result, ID, NA, AR.RMP.WELDQUAL.R, 192.245(a) (192.245(b), 192.245(c), 192.715(a), 192.715(b), 192.715(c))
References
Question Text *From the review of records, were weld defects repaired in accordance with 192.245 and 192.715?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
172. Question Result, ID, NA, AR.RMP.WELDINSPECT.R, 192.241(a) (192.241(b), 192.241(c), 192.243(a), 192.243(b), 192.243(c),
References 192.243(d), 192.243(e), 192.243(f))
Question Text *From the review of records, were welds inspected and examined in accordance with 192.241 and
192.243?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
173. Question Result, ID, NA, AR.RMP.WELDINSPECT.O, 192.241(a) (192.241(b), 192.241(c), 192.243(a), 192.243(b),
References 192.243(c), 192.243(d), 192.243(e), 192.243(f))
Question Text *Were welds inspected and examined in accordance with 192.241 and 192.243?*
Assets Covered 88968 (91)
Result Notes No such activity/condition was observed during the inspection.
174. Question Result, ID, NA, AR.RMP.PIPECONDITION.R, 192.709(a) (192.709(b))
References
Question Text *Do repair records document all information needed to understand the conditions of the pipe and its
environment and provide the information needed to support the Integrity Management Risk Model?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
175. Question Result, ID, NA, AR.RMP.REPLACESTD.R, 192.713(a) (Part 192 Subpart D)
References
Question Text *From the review of records, were any components that were replaced constructed to the same or higher
standards as the original component?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
176. Question Result, ID, Sat, AR.RMP.FIELDREPAIRLEAK.P, 192.605(b) (192.717(a), 192.717(b))
References
Question Text *Is there an adequate process for the permanent field repair of leaks on transmission lines?*
Assets Covered 88968 (91)
Result Notes Repairs Replacements and Relocation

Procedure P192.711 Section VIII Permanent Pipeline Repairs

177. Question Result, ID, NA, AR.RMP.FIELDREPAIRLEAK.R, 192.717(a) (192.717(b))
References
Question Text *From the review of records, did the operator properly repair leaks on transmission lines?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
178. Question Result, ID, NA, AR.RMP.FIELDREPAIRLEAK.O, 192.717(a) (192.717(b))
References
Question Text *Does the operator properly repair leaks on transmission lines?*
Assets Covered 88968 (91)

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

179. Question Result, ID, References Sat, AR.RMP.WELDTTEST.P, 192.605(b) (192.719(a), 192.719(b))

Question Text *Is the process adequate for the testing of replacement pipe and repairs made by welding on transmission lines?*

Assets Covered 88968 (91)

Result Notes Repairs Replacements and Relocation

P192.711 Section VIII.B.1 Company Approved Material

180. Question Result, ID, References NA, AR.RMP.WELDTTEST.R, 192.719(a) (192.719(b))

Question Text *From the review of records, did the operator properly test replacement pipe and repairs made by welding on transmission lines?*

Assets Covered 88968 (91)

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

181. Question Result, ID, References NA, AR.RMP.WELDTTEST.O, 192.719(a) (192.719(b))

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

Assets Covered 88968 (91)

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

182. Question Result, ID, References Sat, AR.RMP.CRACKNDT.P, 192.929(b) (ASME B31.8S-2004 Appendix A3.4)

Question Text *Does the process require that when a pipeline segment that meets the conditions for cracking and/or possible SCC is exposed (i.e., the coating is removed), an NDE method (e.g., MPI, UT) is employed to evaluate for cracking?*

Assets Covered 88968 (91)

Result Notes USPL GP 32-199 ILI Field Inspection Protocol

Section 7.3.1.4 "The entire surface shall be inspected by wet magnetic particle method"

183. Question Result, ID, References NA, AR.RMP.CRACKNDT.R, 192.947(g) (192.929(b))

Question Text *From the review of records, when a pipeline segment that meets the conditions of possible cracking and/or SCC is exposed (i.e., the coating is removed), was an NDE method (e.g., MPI, UT) employed to evaluate for cracking and/or SCC?*

Assets Covered 88968 (91)

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

AR.PA: Pipeline Assessments for Non-IM Onshore Pipelines

184. Question Result, ID, References Sat, AR.PA.ASSESSSCHED.P, 192.710(b)(1) (192.710(b)(3))

Question Text *What is the process/plan (including the selection criteria, timeline, and use of prior assessments) for performing the initial assessments as required by §192.710(b)(1) and (b)(3)?*

Assets Covered 88968 (91)

Result Notes Baseline Assessment Plan Procedure # P-192.901b, Section I. Prioritized Schedule.

185. Question Result, ID, References Sat, AR.PA.ASSESSSCHED.R, 192.710(b)(1) (192.710(b)(3))

Question Text *Do records demonstrate pipeline segments were initially assessed (and when) per §192.710(b)(1)?*

Assets Covered 88968 (91)

Result Notes Ferndale Gas does ILI on the entire pipeline which includes newly define MCAs

Previous run was in 2019 for the 16" and 2020 for 8"

Next runs are 2026 and 2027, respectively

186. Question Result, ID, References **Sat, AR.PA.ASSESSMETHODS.P, 192.710(c)**
 Question Text *Do the procedures include a methodology for conducting the initial assessment of pipeline segments outside of an HCA per §192.710(c)?*
 Assets Covered **88968 (91)**
 Result Notes **Pipeline Integrity Management Procedure # P-192.901**
- Section C Assessment Methods**
187. Question Result, ID, References **Sat, AR.PA.ASSESSMETHODS.R, 192.710(c)**
 Question Text *Do the records confirm the methodology used for conducting the initial assessment of pipeline segments outside of an HCA per §192.710(c) was selected based on the results of a risk-based prioritization?*
 Assets Covered **88968 (91)**
 Result Notes **Ferndale Gas does ILI on the entire pipeline which includes newly define MCAs**
- Previous run was in 2019 for the 16" and 2020 for 8"**
- Next runs are 2026 and 2027, respectively**
188. Question Result, ID, References **Sat, AR.PA.REASSESSMENTS.P, 192.710(b)(2) (192.710(b)(3), 192.939(a))**
 Question Text *Do the procedures require reassessments to be conducted at least once every 10 years, not to exceed 126 months, or a shorter interval based upon the nature and extent of anomalies discovered in the previous assessment as required by §192.710(b)(2)?*
 Assets Covered **88968 (91)**
 Result Notes **Pipeline Integrity Management P 192.901**
- Section B.2 Periodic Reassessment**
189. Question Result, ID, References **Sat, AR.PA.REASSESSMENTS.R, 192.710(b)(2) (192.710(b)(3), 192.939(a))**
 Question Text *Do the records indicate adequate documentation of and rationale for the reassessment intervals?*
 Assets Covered **88968 (91)**
 Result Notes **Ferndale Gas does ILI on the entire pipeline which includes newly define MCAs**
- Previous run was in 2019 for the 16" and 2020 for 8"**
- Next runs are 2026 and 2027, respectively**
190. Question Result, ID, References **Sat, AR.PA.OTHERTECH.P, 192.710(c)(7) (192.18, 192.506(b))**
 Question Text *Where the operator has elected to use "Other Technology" (or other technical evaluation process) for assessing pipeline segments, does the process demonstrate an equivalent understanding of the condition of the line pipe for each of the threats to which the pipeline is susceptible?*
 Assets Covered **88968 (91)**
 Result Notes **Baseline Assessment Plan Procedure # P-192.901b, Section F Other Technology**
191. Question Result, ID, References **NA, AR.PA.OTHERTECH.R, 192.710(c)(7) (192.18, 192.506(b))**
 Question Text *Where the operator has elected to use "Other Technology" (or other technical evaluation process) for assessing pipeline segments, do the records demonstrate an equivalent understanding of the condition of the line pipe for each of the threats to which the pipeline is susceptible?*
 Assets Covered **88968 (91)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
192. Question Result, ID, References **Sat, AR.PA.REMEDIATIONCRITERIA.P, 192.710(f)**
 Question Text *Did the operator's procedures for anomaly investigation and remediation criteria for non-HCA pipeline segments meet the requirements of §§192.485, 192.711, and 192.713?*
 Assets Covered **88968 (91)**

Section A.6

193. Question Result, ID, References **NA, AR.PA.REMEDIATIONCRITERIA.R, 192.710(f) (192.933, 192.709)**
Question Text *Do the remediation records indicate that conducted remediation activities were conducted in accordance with the procedures?*
Assets Covered **88968 (91)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

194. Question Result, ID, References **Sat, AR.PA.THREATID.P, 192.710**
Question Text *Does the process include requirements to identify and evaluate all potential threats to each covered pipeline segment?*
Assets Covered **88968 (91)**
Result Notes **Threat Identification and Risk Analysis**

Procedure # P-192.901c

195. Question Result, ID, References **Sat, AR.PA.THREATID.R, 192.710**
Question Text *Do records demonstrate that all potential threats to each covered pipeline segment have been identified and evaluated?*
Assets Covered **88968 (91)**
Result Notes **Threat review completed on internal dashboard, reviewed dashboard for 8" and 16" line**

All threats identified

Cyber Security identified as part of Business Continuity Plan

196. Question Result, ID, References **Sat, AR.PA.RAMETHOD.P, 192.710**
Question Text *Does the process include requirements for a risk assessment and/or risk prioritization, that considers all of the identified threats for each assessable non-HCA pipeline segment?*
Assets Covered **88968 (91)**
Result Notes **9 threats identified in manual, assign a risk level for each threat for each segment**

197. Question Result, ID, References **Sat, AR.PA.RAMETHOD.P, 192.710**
Question Text *Do records demonstrate that the operator has performed a risk assessment on the non-HCA pipeline segments?*
Assets Covered **88968 (91)**
Result Notes **Risk level assessed for each segment and each threat, threat level identified and categorized by the risk matrix in Annex E**

Procedure 192.901c Threat Identification and Risk Analysis

Spreadsheet shows all risk levels

Reviewed records for 2022 and 2023, 2024 not yet complete

198. Question Result, ID, References **Sat, AR.PA.RAFACTORS.P, 192.710**
Question Text *Does the process include requirements for risk factors that could affect the likelihood of a release, and for factors that could affect the consequences of potential releases, be accounted for and combined in an appropriate manner to produce a risk value for each pipeline segment?*
Assets Covered **88968 (91)**
Result Notes **USPL GP 43-0049-1 Pipeline Integrity Management**

Section 5.4 Pipeline Risk Assessment

Appendix 1 Threat Assessment Procedure

199. Question Result, ID, References **Sat, AR.PA.RAFACTORS.R, 192.710**
Question Text *Do records demonstrate that risk analysis data is combined in an appropriate manner to produce a risk value for each pipeline segment?*
Assets Covered **88968 (91)**
Result Notes **PIM Summary identifies and ranks risk for each segment and each pipeline**

Completed annually, reviewed records

AR.SP: Special Permits

200. Question Result, ID, References **NA, AR.SP.ILISP.P, 190.341(d)**
Question Text *If the pipeline operates under a special permit have the processes been modified to incorporate the requirements of the permit for required ILI assessments performed?*
Assets Covered **88968 (91)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
201. Question Result, ID, References **NA, AR.SP.ILISP.R, 190.341(d)**
Question Text *If the pipeline operates under a special permit, from a review of selected records, were required ILI assessments performed?*
Assets Covered **88968 (91)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
202. Question Result, ID, References **NA, AR.SP.REPAIRSP.P, 190.341(d)**
Question Text *If the pipeline operates under a special permit have the processes been modified to incorporate the requirements of the permit for required repairs?*
Assets Covered **88968 (91)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
203. Question Result, ID, References **NA, AR.SP.REPAIRSP.R, 190.341(d)**
Question Text *If the pipeline operates under a special permit, from a review of selected records, were required repairs performed?*
Assets Covered **88968 (91)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

IM.HC: High Consequence Areas

204. Question Result, ID, References **Sat, IM.HC.HCAID.P, 192.905(a)**
Question Text *Does the process include the methods defined in 192.903 High Consequence Area (Method 1) and/or 192.903 High Consequence Area (Method 2) to be applied to each pipeline for the identification of high consequence areas?*
Assets Covered **88968 (91)**
Result Notes **HCA Identification Procedure # P192.901a Section A**

Gas transmission pipelines utilize Method 2
205. Question Result, ID, References **Sat, IM.HC.HCAID.R, 192.947(d) (192.905(a), 192.907(a), 192.911(a))**
Question Text *Do records demonstrate that the identification of pipeline segments in high consequence areas was completed in accordance with process requirements?*
Assets Covered **88968 (91)**

Result Notes HCA Study completed annually by engineering via satellite imagery, verified in field by technicians.

Reviewed most current HCA/MCA map and methodology

206. Question Result, ID, References NA, IM.HC.HCAMETHOD1.P, 192.903(1)(i) (192.903(1)(ii), 192.903(1)(iii), 192.903(1)(iv))
Question Text *Is the integrity management process adequate for identification of 192.903 High Consequence Areas using Method (1) for identification of HCAs?*
Assets Covered 88968 (91)
Result Notes Ferndale gas does not use Method 1
207. Question Result, ID, References Sat, IM.HC.HCAMETHOD2.P, 192.903(2)(i) (192.903(2)(ii))
Question Text *Is the integrity management process adequate for identification of 192.903 High Consequence Areas using Method (2)?*
Assets Covered 88968 (91)
Result Notes HCA Identification Procedure # P192.901a Section A
208. Question Result, ID, References Sat, IM.HC.HCANEW.P, 192.905(c)
Question Text *Does the process include a requirement for evaluation of new information that impacts, or creates a new, high consequence area?*
Assets Covered 88968 (91)
Result Notes HCA Identification Procedure # P192.901a Section A
209. Question Result, ID, References Sat, IM.HC.HCANEW.R, 192.947(d) (192.905(c))
Question Text *Do records demonstrate new information that impacts, or creates a new, high consequence area has been integrated with the integrity management program?*
Assets Covered 88968 (91)
Result Notes No new HCAs during this timeframe, improvements to the tools used have better defined the HCA boundaries so mileage may have decreased ~0.1 mile
210. Question Result, ID, References Sat, IM.HC.HCAPIR.P, 192.903 (192.905(a))
Question Text *Is the process for defining and applying potential impact radius (PIR) for establishment of high consequence areas consistent with the requirements of 192.903?*
Assets Covered 88968 (91)
Result Notes HCA Identification Procedure # P192.901a Section A
211. Question Result, ID, References Sat, IM.HC.HCAPIR.R, 192.947(d) (192.903, 192.905(a))
Question Text *Do records demonstrate the use of potential impact radius (PIR) for establishment of high consequence areas consistent with requirements of 192.903?*
Assets Covered 88968 (91)
Result Notes PIR is 315 feet

Staff confirmed calculation
212. Question Result, ID, References Sat, IM.HC.HCASITES.P, 192.903 (192.905(b))
Question Text *Does the process for identification of identified sites include the sources listed in 192.905(b) for those buildings or outside areas meeting the criteria specified by 192.903 and require the source(s) of information selected to be documented?*
Assets Covered 88968 (91)
Result Notes HCA Identification Procedure # P192.901a Appendix A
213. Question Result, ID, References Sat, IM.HC.HCASITES.R, 192.947(d) (192.903, 192.905(b))
Question Text *Do records indicate identification of identified sites being performed as required?*
Assets Covered 88968 (91)
Result Notes Reviewed HCA map which has all identified sites labeled

214. Question Result, ID, References **NA, IM.HC.HCAMETHOD1.R, 192.947(d) (192.903(1)(i), 192.903(1)(ii), 192.903(1)(iii), 192.903(1)(iv))**
 Question Text *Do records demonstrate that identification of 192.903 High Consequence Areas using Method (1) was adequate?*
 Assets Covered **88968 (91)**
 Result Notes **Ferndale Gas does not use Method 1**
215. Question Result, ID, References **Sat, IM.HC.HCAMETHOD2.R, 192.947(d) (192.905(a), 192.903(2)(ii))**
 Question Text *Do records demonstrate that the identification of 192.903 High Consequence Areas using Method (2) was adequate?*
 Assets Covered **88968 (91)**
 Result Notes **Reviewed HCA map**

Methodology appears adequate
216. Question Result, ID, References **Sat, IM.HC.HCADATA.O, 192.905(c)**
 Question Text *Are HCAs correctly identified per up-to-date information?*
 Assets Covered **88968 (91)**
 Result Notes **Field observations are consistent with the HCA records provided**

IM.RA: Risk Analysis

217. Question Result, ID, References **Sat, IM.RA.RADATA.P, 192.907 (192.917(b)(1), 192.917(b)(2), 192.917(b)(3), 192.917(b)(4), 192.917(e)(1), 192.911(k))**
 Question Text *Does the process include requirements to gather and integrate existing data and information on the entire pipeline that could be relevant to covered segments?*
 Assets Covered **88968 (91)**
 Result Notes **Procedure 192.901c Threat Identification and Risk Analysis Section B Data Gathering**
218. Question Result, ID, References **Sat, IM.RA.RAMETHOD.P, 192.907 (192.917(d), 192.917(c))**
 Question Text *Does the process include requirements for a risk assessment that considers all of the identified threats for each covered segment, including the requirements of ASME B31.8S-2004 (Section 5) and the need to address potential risk of a compromised operations control system (e.g., cyber-attack)?*
 Assets Covered **88968 (91)**
 Result Notes **9 threats identified in manual, assign a risk level for each threat for each segment**
219. Question Result, ID, References **Sat, IM.RA.THREATID.R, 192.947(b) (192.917(a), 192.917(e), 192.913(b)(1), 192.632)**
 Question Text *Do records demonstrate that all potential threats to each covered pipeline segment have been identified and evaluated?*
 Assets Covered **88968 (91)**
 Result Notes **Threat review completed on internal dashboard, reviewed dashboard for 8" and 16" line**

All threats identified

Cyber Security identified as part of Business Continuity Plan
220. Question Result, ID, References **Sat, IM.RA.RADATA.R, 192.947(b) (192.917(b), 192.917(b)(2), 192.917(b)(3), 192.917(b)(4), 192.917(e)(1), 192.911(k), 192.607)**
 Question Text *Do records demonstrate that existing data and information on the entire pipeline that could be relevant to covered segments being adequately gathered and integrated?*
 Assets Covered **88968 (91)**
 Result Notes **Data compiled from Data management system and input to Threat Assessment dashboard**

Data comes from SME surveys and maintenance records, etc.
221. Question Result, ID, References **Sat, IM.RA.THREATID.P, 192.917(a) (192.917(e), 192.913(b)(1))**

Question Text *Does the process include requirements to identify and evaluate all potential threats to each covered pipeline segment?*

Assets Covered 88968 (91)

Result Notes Procedure 192.901c Threat Identification and Risk Analysis Section A Threat Identification

222. Question Result, ID, References Sat, IM.RA.RAMETHOD.R, 192.947(b) (192.917(c), 192.917(d))

Question Text *Do records demonstrate that the risk assessment follows 192.917(c), 192.917(d), and ASME B31.8S-2004, Section 5, and considers the identified threats for each covered segment?*

Assets Covered 88968 (91)

Result Notes Risk level assessed for each segment and each threat, threat level identified and categorized by the risk matrix in Annex E

Procedure 192.901c Threat Identification and Risk Analysis

Spreadsheet shows all risk levels

Reviewed records for 2022 and 2023, 2024 not yet complete

223. Question Result, ID, References Sat, IM.RA.RAFACTORS.P, 192.907 (192.917(c))

Question Text *Does the process include requirements for factors that could affect the likelihood of a release, and for factors that could affect the consequences of potential releases, be accounted for and combined in an appropriate manner to produce a risk value for each pipeline segment?*

Assets Covered 88968 (91)

Result Notes USPL GP 43-0049-1 Pipeline Integrity Management

Section 5.4 Pipeline Risk Assessment

Appendix 1 Threat Assessment Procedure

224. Question Result, ID, References Sat, IM.RA.RAFACTORS.R, 192.947(b) (192.917(c))

Question Text *Do records demonstrate that risk analysis data is combined in an appropriate manner to produce a risk value for each pipeline segment?*

Assets Covered 88968 (91)

Result Notes PIM Summary identifies and ranks risk for each segment and and each pipeline

Completed annually, reviewed records for 2022 and 2023

225. Question Result, ID, References Sat, IM.RA.RAMOC.P, 192.917(c)

Question Text *Does the process provide for revisions to the risk assessment if new information is obtained or conditions change on the pipeline segments?*

Assets Covered 88968 (91)

Result Notes USPL GP 43-0049-1 Pipeline Integrity Management

Section 5.4f Pipeline Risk Assessment

226. Question Result, ID, References Sat, IM.RA.RAMOC.R, 192.947(b) (192.917(c))

Question Text *Was the risk assessment revised as necessary as new information is obtained or conditions change on the pipeline segments?*

Assets Covered 88968 (91)

Result Notes Risk assessment updated annually

Reviewed records for 2022 and 2023

227. Question Result, ID, References Sat, IM.RA.RAMOC.O, 192.917(c)

Question Text *Are conditions on the pipeline segments accurately reflected in the appropriate risk assessment data and information?*

Assets Covered 88968 (91)

Result Notes Field observations are consistent with the records and procedures provided by Ferndale Gas

IM.BA: Baseline Assessments

228. Question Result, ID, References Sat, IM.BA.BAENVIRON.P, 192.911(o) (192.919(e), 192.750)

Question Text *Does the process include requirements for conducting integrity assessments in a manner that minimizes environmental and safety risks?*

Assets Covered 88968 (91)

Result Notes P-192.901b Baseline Assessment Plan, Section L. Environmental and Safety Risks During Assessments

229. Question Result, ID, References NA, IM.BA.BAENVIRON.R, 192.947(d) (192.911(o), 192.919(e), 192.750)

Question Text *Do records demonstrate that integrity assessments have been conducted in a manner that minimizes environmental and safety risks?*

Assets Covered 88968 (91)

Result Notes No Baseline Assessments during this inspection period

No new HCAs and no new pipelines

MCAs have been assessed along with HCAs since IM Program began

230. Question Result, ID, References Sat, IM.BA.BAMETHODS.P, 192.919(b) (192.921(a), 192.921(c), 192.921(h), 192.937(c), Part 192 - Appendix F)

Question Text *Does the process include requirements for specifying an assessment method(s) that is best suited for identifying anomalies associated with specific threats identified for the covered segment?*

Assets Covered 88968 (91)

Result Notes Baseline Assessment Plan Procedure # P-192.901b

Section A

231. Question Result, ID, References NA, IM.BA.BAMETHODS.R, 192.947(c) (192.919(b), 192.921(a), 192.921(c), 192.921(h), 192.947(d), 192.937(c), Part 192 - Appendix F)

Question Text *Do records demonstrate that the assessment method(s) specified is best suited for identifying anomalies associated with specific threats identified for the covered segment?*

Assets Covered 88968 (91)

Result Notes No Baseline Assessments during this inspection period

No new HCAs and no new pipelines

MCAs have been assessed along with HCAs since IM Program began

232. Question Result, ID, References Sat, IM.BA.BANEW.P, 192.911(p) (192.905(c), 192.921(f), 192.921(g))

Question Text *Does the process include requirements for updating the assessment plan for newly identified areas and newly installed pipe?*

Assets Covered 88968 (91)

Result Notes Baseline Assessment Plan Procedure # P-192.901b

Section K New HCAs/Newly Installed Pipe

233. Question Result, ID, References NA, IM.BA.BANEW.R, 192.947(d) (192.905(c), 192.911(p), 192.921(f), 192.921(g), 192.620)

Question Text *Do records demonstrate that the assessment plan has been adequately updated for new HCAs and newly installed pipe?*

Assets Covered 88968 (91)

Result Notes No Baseline Assessments during this inspection period

No new HCAs and no new pipelines

MCAs have been assessed along with HCAs since IM Program began

234. Question Result, ID, References Sat, IM.BA.BASCHEDULE.P, 192.917(c) (192.919(c), 192.921(b))
Question Text *Did the BAP process require a schedule for completing the assessment activities for all covered segments and consideration of applicable risk factors in the prioritization of the schedule?*
Assets Covered 88968 (91)
Result Notes Baseline Assessment Plan Procedure # P-192.901b, Section I. Prioritized Schedule.
235. Question Result, ID, References NA, IM.BA.BASCHEDULE.R, 192.947(c) (192.921(d), 192.947(d))
Question Text *Do records demonstrate that all BAP required assessments were completed as scheduled?*
Assets Covered 88968 (91)
Result Notes No Baseline Assessments during this inspection period
- No new HCAs and no new pipelines
- MCAs have been assessed along with HCAs since IM Program began
236. Question Result, ID, References NA, IM.BA.BAENVIRON.O, 192.911(o) (192.919(e), 192.750)
Question Text *From field observations, are integrity assessments conducted in a manner that minimizes environmental and safety risks?*
Assets Covered 88968 (91)
Result Notes No such activity/condition was observed during the inspection.

IM.CA: Continual Evaluation and Assessment

237. Question Result, ID, References NA, IM.CA.LOWSTRESSREASSESS.P, 192.941(a) (192.941(b), 192.941(c))
Question Text *Does the process include requirements for the "low stress reassessment" method to address threats of external and/or internal corrosion for pipelines operating below 30% SMYS?*
Assets Covered 88968 (91)
Result Notes Ferndale Gas does not use Low Stress Reassessment
- P192-901f Section F
238. Question Result, ID, References Sat, IM.CA.REASSESSINTERVAL.P, 192.937(a) (192.939(a), 192.939(b), 192.913(c))
Question Text *Is the process for establishing the reassessment intervals consistent with §192.939 and ASME B31.8S-2004?*
Assets Covered 88968 (91)
Result Notes Continuous Evaluation and Assessment Procedure P-192.901f
- Section G Reassessment Timing, Waiver and Deviation
- Next ILI run is scheduled for 2026 (16") and 2027 (8")
239. Question Result, ID, References NA, IM.CA.LOWSTRESSREASSESS.R, 192.947 (192.941(a), 192.941(b), 192.941(c))
Question Text *Do records demonstrate that the implementation of "low stress reassessment" method to address threats of external and/or internal corrosion is adequate and being performed as required?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
240. Question Result, ID, References Sat, IM.CA.PERIODICEVAL.P, 192.937(b) (192.917(a), 192.917(b), 192.917(c), 192.917(d), 192.917(e))

Question Text *Does the process include requirements for a periodic evaluation of pipeline integrity based on data integration and risk assessment to identify the threats specific to each covered segment and the risk represented by these threats?*

Assets Covered 88968 (91)

Result Notes P-192.901f Continuous Evaluation and Assessment

Section D Reassessment Methods

241. Question Result, ID, References Sat, IM.CA.PERIODICEVAL.R, 192.947(d) (192.917(a), 192.917(b), 192.917(c), 192.917(d), 192.917(e), 192.937(b))

Question Text *Do records demonstrate that periodic evaluations of pipeline integrity have been performed based on data integration and risk assessment to identify the threats specific to each covered segment and the risk represented by these threats?*

Assets Covered 88968 (91)

Result Notes Reviewed PIM Summary for both pipelines for 2022 and 2023

Evaluation completed annually

242. Question Result, ID, References Sat, IM.CA.REASSESSINTERVAL.R, 192.947(d) (192.937(a), 192.939(a), 192.939(b), 192.913(c))

Question Text *Do records demonstrate that reassessment intervals were established consistent with the requirements of the operator's processes?*

Assets Covered 88968 (91)

Result Notes Re-assessment Interval determination (RAID) ILI Matrix completed Dec 1, 2020 for 16" and Feb 8, 2022 for 8". Identified next assessment intervals to be 7 years

2026 for Sumas-Cherry Point and 2027 for Cherry Pt-Intalco

243. Question Result, ID, References Sat, IM.CA.REASSESSMETHOD.P, 192.937(c) (192.931, 192.937(d), 192.493, 192.506)

Question Text *Is the approach for establishing reassessment method(s) consistent with the requirements in 192.937(c)?*

Assets Covered 88968 (91)

Result Notes P-192.901f Continuous Evaluation and Assessment, Section D Reassessment Methods

244. Question Result, ID, References Sat, IM.CA.REASSESSMETHOD.R, 192.947(d) (192.937(c), 192.937(d), 192.506, 192.493)

Question Text *Do records document the assessment methods to be used and the rationale for selecting the appropriate assessment method?*

Assets Covered 88968 (91)

Result Notes Reviewed document indicating last tool used and recommendation for next tool

Tool selected based on identified threats

Always run DEF/MFL along with other necessary tools

245. Question Result, ID, References Sat, IM.CA.REASSESSWAIVER.P, 192.943(a) (192.943(b))

Question Text *Does the process include requirements for reassessment interval waivers (special permit per 190.341)?*

Assets Covered 88968 (91)

Result Notes P-192.901f Continuous Evaluation and Assessment, Section G Re-assessment Timing, Waiver, and Deviation

246. Question Result, ID, References NA, IM.CA.REASSESSWAIVER.R, 192.947(d) (192.943(a), 192.943(b))

Question Text *Do records demonstrate that reassessment interval waivers (special permit per §190.341) have been adequately implemented, if applicable?*

Assets Covered 88968 (91)

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

247. Question Result, ID, References Sat, IM.CA.REASSESEXCPERF.P, 192.913(a) (192.913(b), 192.913(c))

Question Text *Does the process include requirements for deviations from reassessment requirements based on exceptional performance?*

Assets Covered 88968 (91)

Result Notes

P-192.901f Continuous Evaluation and Assessment, Section G Re-assessment Timing, Waiver, and Deviation.

248. Question Result, ID, References NA, IM.CA.REASSESEXCPERF.R, 192.947 (192.913(a), 192.913(b), 192.913(c))

Question Text *Do records demonstrate that deviations from reassessment requirements are based on exceptional performance and have been adequately handled, if applicable?*

Assets Covered 88968 (91)

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

IM.PM: Preventive and Mitigative Measures

249. Question Result, ID, References Sat, IM.PM.PMMGENERAL.P, 192.907 (192.935(a), 192.935(f))

Question Text *Do the procedures include requirements to identify additional measures to prevent a pipeline failure and to mitigate the consequences of a pipeline failure in a high consequence area?*

Assets Covered 88968 (91)

Result Notes Preventative and Mitigative Measures Procedure P192-901h

Section A Identification of Additional Measures

250. Question Result, ID, References Sat, IM.PM.PMMGENERAL.R, 192.947 (192.935(a), 192.935(f))

Question Text *Do records demonstrate that additional measures have been identified and implemented (or scheduled) beyond those already required by Part 192 to prevent a pipeline failure and to mitigate the consequences of a pipeline failure in an HCA?*

Assets Covered 88968 (91)

Result Notes Reviewed P&M measures for 8" and 16"

Include weekly aerial patrols, lower operating pressure, etc.

251. Question Result, ID, References Sat, IM.PM.PMMTPD.P, 192.917(e)(1) (192.935(b)(1), 192.935(e))

Question Text *Does the preventive and mitigative measure process include requirements that threats due to third party damage be addressed?*

Assets Covered 88968 (91)

Result Notes Preventative and Mitigative Measures Procedure P192-901h

Section B.1 Damage Prevention Program

252. Question Result, ID, References Sat, IM.PM.PMMTPD.R, 192.947 (192.917(e)(1), 192.935(b)(1), 192.935(e))

Question Text *Do records demonstrate that preventive & mitigative measures have been implemented regarding threats due to third party damage as required by the process?*

Assets Covered 88968 (91)

Result Notes Weekly ROW patrols, on site observation if excavation within 25 feet of pipeline

253. Question Result, ID, References Sat, IM.PM.PMMREVQUAL.P, 192.915(c)

Question Text *Does the process require that persons who implement preventive and mitigative measures or directly supervise excavation work be qualified?*

Assets Covered 88968 (91)

Result Notes Damage Prevention Program Procedure P-192.614

Requires that all tasks be performed by qualified individuals

254. Question Result, ID, References **Sat, IM.PM.PMMREVQUAL.R, 192.947(e) (192.915(c))**
 Question Text *Do records demonstrate that personnel who implement preventive and mitigative measures or directly supervise excavation work are qualified?*
 Assets Covered **88968 (91)**
 Result Notes **Reviewed qualifications for field personnel**
- Tasks qualified for include excavation & backfill, temporary marking, patrolling, etc.**
255. Question Result, ID, References **Sat, IM.PM.PMMPDMSMYS.P, 192.907 (192.935(b)(1)(i), 192.935(b)(1)(iii), 192.935(d), 192 Appendix E Table E.II.1)**
 Question Text *Do the procedures include requirements for preventive and mitigative measures for pipelines operating below 30% SMYS?*
 Assets Covered **88968 (91)**
 Result Notes **Preventative and Mitigative Measures Procedure P192-901h**
- Section D Pipelines Operating Below 30% SMYS**
256. Question Result, ID, References **NA, IM.PM.PMMPDMSMYS.R, 192.947(d) (192.935(d))**
 Question Text *Do records demonstrate that preventive and mitigative measures for pipelines operating below 30% SMYS are being performed?*
 Assets Covered **88968 (91)**
 Result Notes **Ferndale Gas does not perform P&M Measures under this provision**
257. Question Result, ID, References **NA, IM.PM.PMMPLASTIC.P, 192.907 (192.935(e))**
 Question Text *Do the procedures include requirements for preventive and mitigative measures for plastic transmission pipelines?*
 Assets Covered **88968 (91)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
258. Question Result, ID, References **NA, IM.PM.PMMPLASTIC.R, 192.947(d) (192.935(e))**
 Question Text *Do records demonstrate that preventive and mitigative measures for plastic transmission pipelines were performed?*
 Assets Covered **88968 (91)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
259. Question Result, ID, References **Sat, IM.PM.PMMPDMSMYS.P, 192.935(b)(2)**
 Question Text *Does the process adequately address significant threats due to outside force (e.g., earth movement, floods, unstable suspension bridge)?*
 Assets Covered **88968 (91)**
 Result Notes **Preventative and Mitigative Measures Procedure P192-901h**
- Section C Outside Force Damage**
260. Question Result, ID, References **Sat, IM.PM.PMMPDMSMYS.R, 192.947(d) (192.935(b)(2))**
 Question Text *Do records demonstrate that significant threats due to outside force (e.g., earth movement, floods, unstable suspension bridge) are being adequately addressed?*
 Assets Covered **88968 (91)**
 Result Notes **Facilities secured in locked areas, protection from vehicle damage at Block Valve 2**
261. Question Result, ID, References **Sat, IM.PM.PMMRMV.P, 192.935(c)**
 Question Text *Does the process include requirements to decide if RMVs or AETs represent an efficient means of adding protection to potentially affected HCAs?*
 Assets Covered **88968 (91)**

Result Notes Preventative and Mitigative Measures Procedure P192-901h

Section G Automatic Shut-off Valves or Remote Control Valves

At this time no valves are listed as RMVs

262. Question Result, ID, References NA, IM.PM.PMMRMV.R, 192.947(d) (192.935(c))
Question Text *Do records demonstrate that the operator has determined, based on risk, whether RMVs or AETs should be added to protect high consequence areas?*
Assets Covered 88968 (91)
Result Notes No determination has been made that RMVs or AETs should be added
263. Question Result, ID, References Sat, IM.PM.PMMIMPLEMENT.O, 192.935(a)
Question Text *Have identified additional preventive and mitigative measures to reduce the likelihood or consequence of a pipeline failure in an HCA been implemented?*
Assets Covered 88968 (91)
Result Notes Extra patrols performed, protection from vehicular damage at select locations, etc
264. Question Result, ID, References Sat, IM.PM.PMCORR.P, 192.933 (192.917(e)(5))
Question Text *Does the process adequately account for taking required actions to address significant corrosion threats?*
Assets Covered 88968 (91)
Result Notes Preventative and Mitigative Measures Procedure P192-901h

Section F Corrosion

Perform CIS every 5-7 years

Last performed in 2020

265. Question Result, ID, References Sat, IM.PM.PMCORR.R, 192.933 (192.917(e)(5))
Question Text *Do records demonstrate that required actions are being taken to address significant corrosion threats as required?*
Assets Covered 88968 (91)
Result Notes Perform CIS every 5-7 years
- Last performed in 2020
- ILI performed to detect corrosion anomalies
- Records reviewed in 2021 for these assessments performed in 2019 and 2020

IM.QA: Quality Assurance

266. Question Result, ID, References Sat, IM.QA.QARM.P, 192.911(l)
Question Text *Are quality assurance processes in place for risk management applications that meet the requirements of ASME B31.8S-2004, Section 12?*
Assets Covered 88968 (91)
Result Notes P-192.901I Quality Assurance Procedure
- Section A Program Requirements for Quality Assurance
267. Question Result, ID, References Sat, IM.QA.IMNONMANDT.P, 192.7(a)
Question Text *Does the process include requirements that non-mandatory requirements (e.g., "should" statements) from industry standards or other documents invoked by Subpart O (e.g., ASME B31.8S-2004 and NACE SP0502-2010) be addressed by an appropriate approach?*

Assets Covered 88968 (91)
Result Notes P-192.901I Quality Assurance Procedure

Section C Invoking Non-Mandatory Statements in Standards

268. Question Result, ID, References Sat, IM.QA.QARM.R, 192.947(d) (192.911(l))
Question Text *Do records demonstrate that the quality assurance process for risk management applications is being completed as required by ASME B31.8S-2004, Section 12?*
Assets Covered 88968 (91)
Result Notes PIM Program - Annual Effectiveness Summary
- Summary that show Pipeline Metrics, assessment data, repair data, whether risk thresholds were met or need additional P&Ms, Insights and Revisions to manual for subsequent years
269. Question Result, ID, References Sat, IM.QA.RECORDS.P, 192.947(a) (192.947(b), 192.947(c), 192.947(d), 192.947(e), 192.947(f), 192.947(g), 192.947(h), 192.947(i), 192.517(a))
Question Text *Is the process adequate to assure that required records are maintained for the useful life of the pipeline?*
Assets Covered 88968 (91)
Result Notes Pipeline Integrity Management Procedure P192-901

Section V

270. Question Result, ID, References Sat, IM.QA.IMMOC.P, 192.911(k) (192.13(d), 192.909(a), 192.909(b)) (also presented in: MO.GO)
Question Text *Is the process for management of changes that may impact pipeline integrity adequate?*
Assets Covered 88968 (91)
Result Notes P-192.901k Management of Change Procedure
271. Question Result, ID, References Sat, IM.QA.IMMOC.R, 192.947(d) (192.13(d), 192.909(a), 192.909(b), 192.911(k))
Question Text *Do records demonstrate that changes that may impact pipeline integrity are being managed as required?*
Assets Covered 88968 (91)
Result Notes Internal MOC site to manage changes
- Reviewed a change due to regulatory changes, IBR documents
- No changes to pipeline, threats or HCA segments that needed to go through MOC process
272. Question Result, ID, References Sat, IM.QA.IMPERFEFFECTIVE.P, 192.945(a) (192.913(b), 192.951)
Question Text *Does the process for measuring IM program effectiveness include the elements necessary to conduct a meaningful evaluation?*
Assets Covered 88968 (91)
Result Notes P-192.901i Performance Measures
- Procedure describing Annual IMP Effectiveness Summary process
273. Question Result, ID, References Sat, IM.QA.IMPERFEFFECTIVE.R, 192.947(d) (192.913(b), 192.945(a), 192.951)
Question Text *Do records demonstrate that the methods to measure Integrity Management Program effectiveness provide effective evaluation of program performance and result in program improvements where necessary?*
Assets Covered 88968 (91)
Result Notes PIM Program - Annual Effectiveness Summary
- Summary that show Pipeline Metrics, assessment data, repair data, whether risk thresholds were met or need additional P&Ms, Insights and Revisions to manual for subsequent years
274. Question Result, ID, References Sat, IM.QA.IMPERFMETRIC.P, 192.945(a) (192.913(b), 192.951)

Question Text *Does the process to evaluate IM program effectiveness include an adequate set of performance metrics to provide meaningful insight into IM program performance?*

Assets Covered 88968 (91)

Result Notes P-192.901i Performance Measures

Procedure describing Annual IMP Effectiveness Summary process

275. Question Result, ID, References Sat, IM.QA.IMPERFMETRIC.R, 192.947(d) (192.913(b), 192.945(a), 192.951)

Question Text *Do records demonstrate that performance metrics are providing meaningful insight into integrity management program performance?*

Assets Covered 88968 (91)

Result Notes PIM Program - Annual Effectiveness Summary

Scorecard Measures are tracked year-to-year and color coded to identify if the metric is being met

276. Question Result, ID, References Sat, IM.QA.RECORDS.R, 192.947(a) (192.947(b), 192.947(c), 192.947(d), 192.947(e), 192.947(f), 192.947(g), 192.947(h), 192.947(i), 192.517(a))

Question Text *Are required records being maintained for the life of the pipeline?*

Assets Covered 88968 (91)

Result Notes All requested records have been available and provided

MO.MCA: Moderate Consequence Areas (MCA)

277. Question Result, ID, References Sat, MO.MCA.MCADEF.P, 192.624(a)(2) (192.710(a)(2), 192.3)

Question Text *Is the operator's MCA definition consistent with the §192.3 Definition?*

Assets Covered 88968 (91)

Result Notes Pipeline Integrity Management

P192.901 Section VIII Assessment outside HCAs

Section A Moderate Consequence Areas

278. Question Result, ID, References Sat, MO.MCA.MCAIDENTIF.P, 192.624(a)(2) (192.710(a)(2),)

Question Text *What is the methodology being used for identifying MCAs?*

Assets Covered 88968 (91)

Result Notes High Consequence Area Identification

Procedure P192.901a Section A

"The following procedure will also be used for the purposes of determining MCAs

279. Question Result, ID, References Sat, MO.MCA.MCAIDENTIF.R, 192.624(a)(2) (192.710(a)(2),)

Question Text *Do the records demonstrate MCAs are properly identified and documented with the physical characteristics/attributes, operating conditions, and surrounding environmental conditions of the pipeline?*

Assets Covered 88968 (91)

Result Notes Reviewed HCA/MCA map

Multiple locations identified, 1 based on I-5 crossing and others based on 5 structures in PIR

280. Question Result, ID, References Sat, MO.MCA.MCAIDENTIF.O, 192.624(a)(2) (192.710(a)(2),)

Question Text *Do field observations of select locations indicate MCAs in the field are consistent with operator's most recent documented MCAs?*

Assets Covered 88968 (91)

Result Notes Field observations are consistent with the records that Ferndale Gas provided. The pipeline is mostly rural so limited MCAs due to number structures

One MCA for I-5 crossing

281. Question Result, ID, References Sat, MO.MCA.MCAIDENTIFROAD.R, 192.3 (192.624, 192.712)

Question Text Do records demonstrate the operator properly identified and applied "covered" roadways that could be affected by the PIR, and therefore considered a "pipeline with an MCA"?

Assets Covered 88968 (91)

Result Notes One MCA for roadway at I-5 crossing

282. Question Result, ID, References Sat, MO.MCA.MCAPIR.P, 192.903 (192.3, 192.624(a)(2), 192.710)

Question Text Is the process for calculating and applying potential impact radius (PIR) for establishment of Moderate Consequence Areas (MCAs) consistent with the requirements of 192.3 and 192.903?

Assets Covered 88968 (91)

Result Notes High Consequence Area Identification

Procedure P192.901a Section D

283. Question Result, ID, References Sat, MO.MCA.MCAPIR.R, 192.903 (192.3, 192.624(a)(2), 192.710)

Question Text Do records demonstrate the application of potential impact radius (PIR) for establishment of Moderate Consequence Areas (MCAs) is consistent with the requirements of 192.3 and 192.903?

Assets Covered 88968 (91)

Result Notes PIR identified on HCA/MCA map

Performed calculation to verify

284. Question Result, ID, References Sat, MO.MCA.MCANEW.P, 192.613(a) (192.624(a)(2), 192.903, 192.5(d), 192.3)

Question Text Does the process include a requirement for periodic evaluation of new information that creates a new Moderate Consequence Area?

Assets Covered 88968 (91)

Result Notes Pipeline Integrity Management

Procedure P192.901 Section VIII.A.2

285. Question Result, ID, References Sat, MO.MCA.MCANEW.R, 192.613(a) (192.624(a)(2), 192.903, 192.5(d), 192.3)

Question Text Do records demonstrate new information that creates a new Moderate Consequence Area was periodically collected and evaluated?

Assets Covered 88968 (91)

Result Notes Annual Class Location & HCA/MCA Identification

286. Question Result, ID, References Sat, MO.MCA.MAOPRECONFIRM.P, 192.624(a)(2) (192.632(a))

Question Text What is the written procedure for identifying legacy (grandfathered) pipeline segments affecting MCAs which must have their MAOP reconfirmed?

Assets Covered 88968 (91)

Result Notes MAOP Reconfirmation

Procedure P192.624

287. Question Result, ID, References NA, MO.MCA.MAOPRECONFIRM.R, 192.624(d) (192.603(b), 192.605(b)(1), 192.624(a)(2), 192.632(a))

Question Text Do the records adequately identify legacy (grandfathered) pipeline segments affecting MCAs which must have their MAOP reconfirmed?

Assets Covered 88968 (91)

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

PD.DP: Damage Prevention

288. 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 **88968 (91)**
Result Notes **Preventative and Mitigative Measure**

Procedure P192.901h

Section B
289. 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 **88968 (91)**
Result Notes **Reviewed annual threat analysis**

In 2022 3rd party damage was identified as a high threat due to staffing, has since been reduced to a moderate threat based on higher staffing level

Damage Prevention data is collected during patrols and surveys and used for threat analysis

RPT.NR: Notices and Reporting

290. Question Result, ID, References **Sat, RPT.NR.NOTIFYIMCHANGE.P, 192.909(b) (192.921(a)(7), 192.937(c)(7), 192.18)**
Question Text *Is the process for notifying PHMSA and/or state/local authorities of significant changes to the Integrity Management Program adequate?*
Assets Covered **88968 (91)**
Result Notes **P-192.901 Pipeline Integrity Management Procedure, Section VI(6) Subsection A**
291. Question Result, ID, References **NA, RPT.NR.NOTIFYIMCHANGE.R, 192.947(i) (192.909(b), 192.921(a)(7), 192.937(c)(7))**
Question Text *Do records demonstrate that PHMSA and/or state/local authorities were notified of substantial or significant changes to the Integrity Management Program?*
Assets Covered **88968 (91)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
292. Question Result, ID, References **Sat, RPT.NR.NOTIFYIMPRESS.P, 192.933(a)(1)**
Question Text *Do processes require notifying PHMSA and/or state/local authorities: 1) if the schedule for evaluation and remediation required under paragraph 192.933(c) cannot be met and safety cannot be provided through temporary reduction in operating pressure or other action, and 2) when a pressure reduction exceeds 365 days?*
Assets Covered **88968 (91)**
Result Notes **Pipeline Integrity Management**

Procedure P192.901

Section VI PHMSA Notification Process
293. Question Result, ID, References **NA, RPT.NR.NOTIFYIMPRESS.R, 192.947(i) (192.933(a)(1))**
Question Text *Do records demonstrate that PHMSA and/or state/local authorities were notified with the required information when one of the following occurred: 1) schedule for evaluation and remediation could not be met and safety could not be provided through a temporary reduction in operating pressure, or 2) when a pressure reduction exceeded 365 days?*
Assets Covered **88968 (91)**

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

294. Question Result, ID, References Sat, RPT.NR.IMDEVIATERPT.P, 192.913(b)(1)(vii)

Question Text *Is there a process for reporting integrity management program performance measures if deviating from certain IMP requirements (exceptional performance)?*

Assets Covered 88968 (91)

Result Notes Pipeline Integrity Management

Procedure P192.901

Section VI PHMSA Notification Process

295. Question Result, ID, References NA, RPT.NR.IMDEVIATERPT.R, 192.947(i) (192.913(b)(1)(vii))

Question Text *Do records demonstrate adequate reporting of integrity management program performance measures if deviating from certain IMP requirements (exceptional performance)?*

Assets Covered 88968 (91)

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

296. Question Result, ID, References Sat, RPT.NR.IMPERFRPT.P, 192.947(i) (192.945(a), 191.17, ASME B31.8S-2004 Appendix A Section 9.8)

Question Text *Is there a process for annual reporting of integrity management performance data?*

Assets Covered 88968 (91)

Result Notes Annual Reports

Procedure P191.17

297. Question Result, ID, References Sat, RPT.NR.IMPERFRPT.R, 192.947(i) (192.945(a), 191.17, ASME B31.8S-2004 Appendix A Section 9.8)

Question Text *Do annual reports demonstrate that integrity management performance data were reported?*

Assets Covered 88968 (91)

Result Notes No integrity management data to report

Reviewed records for 2021, 2022 and 2023

TD.ATM: Atmospheric Corrosion

298. Question Result, ID, References Sat, TD.ATM.ATMCORRODE.P, 192.605(b)(2) (192.479(a), 192.479(b), 192.479(c), 192.9(f)(1), 192.453)

Question Text *Does the process give adequate guidance identifying atmospheric corrosion and for protecting above ground pipe from atmospheric corrosion?*

Assets Covered 88968 (91)

Result Notes P-192.453 - Corrosion Control; Section XIII(8) - Atmospheric Corrosion and Coating Materials

299. Question Result, ID, References Sat, TD.ATM.ATMCORRODE.R, 192.491(c) (192.479(a), 192.479(b), 192.479(c), 192.9(f)(1), 192.453)

Question Text *Do records document the protection of above ground pipe from atmospheric corrosion?*

Assets Covered 88968 (91)

Result Notes Atmospheric survey completed every 3 years NTE 39 months

Reviewed records for 2021-2023

300. Question Result, ID, References Sat, TD.ATM.ATMCORRODEINSP.P, 192.605(b)(2) (192.481(a), 192.481(b), 192.481(c), 192.481(d), 192.9(f)(1), 192.453)

Question Text *Does the process give adequate instruction for the inspection of aboveground pipeline segments for atmospheric corrosion?*

Assets Covered 88968 (91)

Result Notes P-192.453 - Corrosion Control; Section XIV - Monitoring Atmospheric Corrosion

301. Question Result, ID, Sat, TD.ATM.ATMCORRODEINSP.R, 192.491(c) (192.481(a), 192.481(b), 192.481(c), 192.481(d),
References 192.9(f)(1), 192.453)
Question Text *Do records document inspection of aboveground pipe for atmospheric corrosion?*
Assets Covered 88968 (91)
Result Notes Atmospheric survey completed every 3 years NTE 39 months

Reviewed records for 2021-2023

302. Question Result, ID, Sat, TD.ATM.ATMCORRODEINSP.O, 192.481(b) (192.481(c), 192.479(a), 192.479(b), 192.479(c),
References 192.481(d), 192.9(f)(1), 192.453, 192.491)
Question Text *Is pipe that is exposed to atmospheric corrosion protected?*
Assets Covered 88968 (91)
Result Notes Completed field inspection during standard inspection on July 24, 2024

All above ground locations looked to be in good condition and were well-coated

TD.CPMONITOR: External Corrosion - CP Monitoring

303. Question Result, ID, Sat, TD.CPMONITOR.MONITORCRITERIA.P, 192.605(b)(2) (192.463(a), 192.463(c), 192.9(f)(1),
References 192.452(b), 192.452(c), 192.453)
Question Text *Does the process require CP monitoring criteria to be used that is acceptable?*
Assets Covered 88968 (91)
Result Notes P-192.453 - Corrosion Control; Section VIII - Criteria Used to Determine the Adequacy of Cathodic Protection

Section B and C

304. Question Result, ID, Sat, TD.CPMONITOR.MONITORCRITERIA.R, 192.491(c) (192.463(a), 192.9(f)(1), 192.452, 192.453,
References 192.491)
Question Text *Do records document that the CP monitoring criteria used was acceptable?*
Assets Covered 88968 (91)
Result Notes -850 mV or 100mV shift criteria

All reads met criteria

305. Question Result, ID, Sat, TD.CPMONITOR.MONITORCRITERIA.O, 192.465(a) (192.463(a), 192.463(b), 192.463(c), Part 192,
References Appendix D)
Question Text *Are methods used for taking CP monitoring readings that allow for the application of appropriate CP monitoring criteria?*
Assets Covered 88968 (91)
Result Notes Completed field inspection during standard inspection on July 24, 2024

Reads were taken with a calibrated half cell and multimeter

All reads met criteria

306. Question Result, ID, Sat, TD.CPMONITOR.TEST.P, 192.605(b)(2) (192.465(a), 192.9(f)(1), 192.452, 192.453)
References
Question Text *Does the process adequately describe how to monitor CP that has been applied to pipelines?*
Assets Covered 88968 (91)
Result Notes P-192.453 - Corrosion Control

Section B and C

307. Question Result, ID, Sat, TD.CPMONITOR.TEST.R, 192.491(c) (192.465(a), 192.9(f)(1), 192.452, 192.453, 192.491)
References
Question Text *Do records adequately document cathodic protection monitoring tests have occurred as required?*
Assets Covered 88968 (91)

Result Notes Completed annually NTE 15 months

Reviewed records for 2021, 2022 and 2023

Completed April 2021, June 2022 and June 2023

308. Question Result, ID, References Sat, TD.CPMONITOR.CURRENTTEST.P, 192.605(b)(2) (192.465(b), 192.9(f)(1), 192.452, 192.453)
Question Text *Does the process give sufficient details for making electrical checks of rectifiers or impressed current sources?*
Assets Covered 88968 (91)
Result Notes P-192.453 - Corrosion Control

Appendix A

309. Question Result, ID, References Sat, TD.CPMONITOR.CURRENTTEST.R, 192.491(c) (192.465(b), 192.9(f)(1), 192.452, 192.453, 192.491)
Question Text *Do records document details of electrical checks of sources of rectifiers or other impressed current sources?*
Assets Covered 88968 (91)
Result Notes Rectifiers inspected 6x per year NTE 2.5 months

Some instances completed by Norton Corrosion based on workload

Reviewed records for 2021-2023

310. Question Result, ID, References Sat, TD.CPMONITOR.CURRENTTEST.O, 192.465(b)
Question Text *Are impressed current sources properly maintained and are they functioning properly?*
Assets Covered 88968 (91)
Result Notes Inspected Rectifier R200

See Form R for details

311. Question Result, ID, References Sat, TD.CPMONITOR.REVCURRENTTEST.P, 192.605(b)(2) (192.465(c), 192.9(f)(1), 192.452, 192.453)
Question Text *Does the process give sufficient details for making electrical checks of interference bonds, diodes, and reverse current switches?*
Assets Covered 88968 (91)
Result Notes P-192.453 - Corrosion Control

Appendix A Section E

312. Question Result, ID, References Sat, TD.CPMONITOR.REVCURRENTTEST.R, 192.491(c) (192.465(c), 192.9(f)(1), 192.452, 192.453, 192.491)
Question Text *Do records document details of electrical checks interference bonds, diodes, and reverse current switches?*
Assets Covered 88968 (91)
Result Notes Two bonds on system

One non-critical with CNG and one critical with other BP line

Both are checked 6x per year NTE 2.5 months

Reviewed records for 2021-2023

313. Question Result, ID, References Sat, TD.CPMONITOR.REVCURRENTTEST.O, 192.465(c)
Question Text *Are interference bonds, diodes, and reverse current switches properly maintained and are they functioning properly?*
Assets Covered 88968 (91)

Result Notes One critical and one non-critical bond inspected

Both were in good condition and could be checked for current flow

See Form R for details

314. Question Result, ID, References Sat, TD.CPMONITOR.DEFICIENCYEXTENT.P, 192.605(b)(2) (192.465(d), 192.465(f))
Question Text *For onshore gas transmission pipelines, does the process require that the operator develop a remedial action plan to determine the extent of the area affected when low cathodic protection levels are detected?*
Assets Covered 88968 (91)
Result Notes P-192.453 - Corrosion Control
- Section IX.D
315. Question Result, ID, References NA, TD.CPMONITOR.DEFICIENCYEXTENT.R, 192.491(c) (192.465(d), 192.465(f))
Question Text *For onshore gas transmission pipelines, does the remedial action plan adequately document actions taken to determine the extent of inadequate cathodic protection, and correct any identified deficiencies in corrosion control?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
316. Question Result, ID, References NA, TD.CPMONITOR.DEFICIENCYEXTENT.O, 192.465(f) (192.465(d))
Question Text *Is the extent of inadequate cathodic protection identified, and if found, corrected?*
Assets Covered 88968 (91)
Result Notes No such activity/condition was observed during the inspection.
317. Question Result, ID, References Sat, TD.CPMONITOR.DEFICIENCY.P, 192.605(b)(2) (192.465(d), 192.9(f)(1), 192.452, 192.453)
Question Text *Does the process require that the operator promptly correct any identified deficiencies in corrosion control?*
Assets Covered 88968 (91)
Result Notes P-192.453 - Corrosion Control
- Section IX.D
318. Question Result, ID, References NA, TD.CPMONITOR.DEFICIENCY.R, 192.491(c) (192.465(d), 192.9(f)(1), 192.452, 192.453, 192.491)
Question Text *Do records adequately document actions taken to correct any identified deficiencies in corrosion control?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
319. Question Result, ID, References Sat, TD.CPMONITOR.DEFICIENCYGT.P, 192.605(b)(2) (192.465(d))
Question Text *For onshore gas transmission pipelines, does the process require prompt actions are taken to correct any identified deficiencies in corrosion control found during inspections/testing?*
Assets Covered 88968 (91)
Result Notes P-192.453 - Corrosion Control
- Section IX.D
320. Question Result, ID, References NA, TD.CPMONITOR.DEFICIENCYGT.R, 192.491(c) (192.465(d))
Question Text *For onshore gas transmission pipelines, do records adequately document actions taken to correct any identified deficiencies in corrosion control found during inspections/testing?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
321. Question Result, ID, References Sat, TD.CPMONITOR.TESTSTATION.P, 192.469 (192.9(f)(1), 192.452, 192.453)

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

Assets Covered 88968 (91)

Result Notes P-192.453 - Corrosion Control

Section VI.B

322. Question Result, ID, References Sat, TD.CPMONITOR.TESTSTATION.R, 192.469 (192.9(f)(1), 192.452, 192.453, 192.491)

Question Text *Do records identify the location of test stations and show a sufficient number of test stations?*

Assets Covered 88968 (91)

Result Notes Reviewed annual test station readings

323. Question Result, ID, References Sat, TD.CPMONITOR.TESTSTATION.O, 192.469

Question Text *Do cathodically protected pipelines have a sufficient number of test stations?*

Assets Covered 88968 (91)

Result Notes Many test stations along the pipeline

See Form R for locations visited

324. Question Result, ID, References Sat, TD.CPMONITOR.TESTLEAD.P, 192.605(b)(2) (192.471(a), 192.471(b), 192.471(c), 192.9(f)(1), 192.452, 192.453)

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

Assets Covered 88968 (91)

Result Notes P-192.453 - Corrosion Control

Section VI.B

325. Question Result, ID, References Sat, TD.CPMONITOR.TESTLEAD.R, 192.491(c) (192.471(a), 192.471(b), 192.471(c), 192.9(f)(1), 192.452, 192.453, 192.491)

Question Text *Do records document that pipelines with cathodic protection have electrical test leads installed in accordance with requirements of Subpart I?*

Assets Covered 88968 (91)

Result Notes Test lead installed on 11/13/23

Reviewed work package and contractor qualification

326. Question Result, ID, References Sat, TD.CPMONITOR.TESTLEAD.O, 192.471(a) (192.471(b), 192.471(c))

Question Text *Do pipelines with cathodic protection have electrical test leads installed in accordance with requirements of Subpart I?*

Assets Covered 88968 (91)

Result Notes All test locations inspected gave accurate readings

327. Question Result, ID, References Sat, TD.CPMONITOR.INTFRCURRENT.P, 192.605(b)(2) (192.473(a), 192.9(d), 192.9(e), 192.9(f)(1), 192.452, 192.453)

Question Text *For pipelines other than onshore gas transmission, does the operator have a program in place to minimize detrimental effects of interference currents on its pipeline system?*

Assets Covered 88968 (91)

Result Notes P-192.453 - Corrosion Control

Section XI Interference Currents

328. Question Result, ID, References NA, TD.CPMONITOR.INTFRCURRENT.R, 192.491(c) (192.473(a), 192.9(f)(1), 192.452, 192.453, 192.491)

Question Text *For pipelines other than onshore gas transmission, do records document an effective program is in place to minimize detrimental effects of interference currents and that detrimental effects of interference currents from CP systems on other underground metallic structures are minimized?*

Assets Covered 88968 (91)

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

329. Question Result, ID, References **Sat, TD.CPMONITOR.INTFRCURRENT.O, 192.473(a)**
 Question Text *Are areas of potential stray current identified, and if found, the detrimental effects of stray currents minimized?*
 Assets Covered **88968 (91)**
 Result Notes **Two bonds in the system**
- Both are monitored during bimonthly inspection**
- Visited during field inspection July**
- See Form R for details**
330. Question Result, ID, References **Sat, TD.CPMONITOR.INTFRCURRENTDES.P, 192.605(b)(2) (192.473(b))**
 Question Text *Does the operator have a program for designing and installing cathodic protection systems that minimizes the detrimental effects of interference currents on existing adjacent metallic structures?*
 Assets Covered **88968 (91)**
 Result Notes **P-192.453 - Corrosion Control**
- Section XI Interference Currents**
331. Question Result, ID, References **NA, TD.CPMONITOR.INTFRCURRENTDES.R, 192.491(c) (192.473(b))**
 Question Text *Do records for the design and installation of cathodic protection systems demonstrate the operator reduced the detrimental effects of interference currents on existing adjacent metallic structures?*
 Assets Covered **88968 (91)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
332. Question Result, ID, References **Sat, TD.CPMONITOR.INTFRCURRENTSURV.P, 192.605(b)(2) (192.473(c)(1), 192.473(c)(2))**
 Question Text *For onshore transmission pipelines, does the operator have a program in place to identify and analyze the detrimental effects of interference currents on its pipeline system by performing interference surveys to detect the presence and level of any electrical stray current.*
 Assets Covered **88968 (91)**
 Result Notes **P-192.453 - Corrosion Control**
- Section XI Interference Currents**
- Appendix B Interference Currents**
- Section 3.0 Locating Interference**
333. Question Result, ID, References **Sat, TD.CPMONITOR.INTFRCURRENTSURV.R, 192.491(c) (192.473(c)(1), 192.473(c)(2))**
 Question Text *For onshore gas transmission pipelines, do records document an effective program to identify and analyze interference currents by performing interference and monitoring surveys to detect the presence and level of any electrical stray current?*
 Assets Covered **88968 (91)**
 Result Notes **Two bonds installed where interference currents were present**
- Take AC read during annual CP survey, no issues found**
334. Question Result, ID, References **Sat, TD.CPMONITOR.INTFRCURRENTREM.P, 192.605(b)(2) (192.473(c)(3), 192.473(c)(4))**
 Question Text *For transmission pipelines, does the program to minimize the detrimental effects of interference currents on its pipeline system include requirements to develop a remedial plan to correct instances that would impede the safe operation of the pipeline or adversely impact the environment or public?*
 Assets Covered **88968 (91)**
 Result Notes **P-192.453 - Corrosion Control**

Section XI Interference Currents

Appendix B Interference Currents

Section 3.0 Locating Interference

335. Question Result, ID, References **NA, TD.CP.MONITOR.INTFRCURRENTREM.R, 192.491(c) (192.473(c)(3), 192.473(c)(4))**
Question Text *For onshore gas transmission pipelines, do records document an effective program is in place to minimize detrimental effects of interference currents and that detrimental effects of interference currents from CP systems on other underground metallic structures are minimized?*
Assets Covered **88968 (91)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

TD.CP: External Corrosion - Cathodic Protection

336. Question Result, ID, References **Sat, TD.CP.POST1971.P, 192.605(b)(2) (192.455(a), 192.452(a), 192.452(b), 192.455(f), 192.455(g), 192.9(f)(1), 192.452, 192.453)**
Question Text *Does the process require that each buried or submerged pipeline installed after July 31, 1971, be protected against external corrosion with a cathodic protection system within 1 year after completion of construction, conversion to service, or becoming jurisdictional onshore gathering?*
Assets Covered **88968 (91)**
Result Notes **P-192.453 - Corrosion Control**

Section V Pipelines Required to Have CP

337. Question Result, ID, References **Sat, TD.CP.POST1971.R, 192.491(c) (192.455(a), 192.457(a), 192.452(a), 192.452(b), 192.455(f), 192.455(g), 192.9(f)(1), 192.452, 192.453, 192.491)**
Question Text *Do records document that each buried or submerged pipeline installed after July 31, 1971, has been protected against external corrosion with a cathodic protection system within 1 year after completion of construction, conversion to service, or becoming jurisdictional onshore gathering?*
Assets Covered **88968 (91)**
Result Notes **Completed annually NTE 15 months**

Reviewed records for 2021, 2022 and 2023

Completed April 2021, June 2022 and June 2023

338. Question Result, ID, References **NA, TD.CP.PRE1971.P, 192.605(b)(2) (192.457(b), 192.9(f)(1), 192.452, 192.453)**
Question Text *Does the process require that pipelines installed before August 1, 1971 (except for cast and ductile iron lines) which are 1) bare or ineffectively coated transmission lines or 2) bare or coated pipes in compressor, regulator or meter stations must be cathodically protected in areas where active corrosion is found?*
Assets Covered **88968 (91)**
Result Notes **No pipelines installed before August 1, 1971**

339. Question Result, ID, References **NA, TD.CP.PRE1971.R, 192.491(c) (192.457(b), 192.9(f)(1), 192.452, 192.453, 192.491)**
Question Text *Do records document that pipelines installed before August 1, 1971 (except for cast and ductile iron lines) which are 1) bare or ineffectively coated transmission lines, or 2) bare or coated pipes in compressor, regulator or meter stations have been cathodically protected in areas where active corrosion was found?*
Assets Covered **88968 (91)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

340. Question Result, ID, References **NA, TD.CP.PRE1971.O, 192.457(b)**
Question Text *Are bare or coated pipes in compressor, regulator or meter stations installed before August 1, 1971 (except for cast and ductile iron lines) cathodically protected in areas where active corrosion was found in accordance with Subpart I of Part 192?*
Assets Covered **88968 (91)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

341. Question Result, ID, References **NA, TD.CP.UNPROTECT.P, 192.605(b)(2) (192.465(e), 192.9(f)(1), 192.452, 192.453)**
 Question Text *Does the process give sufficient direction for the monitoring of external corrosion on buried pipelines that are not protected by cathodic protection?*
 Assets Covered **88968 (91)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
342. Question Result, ID, References **NA, TD.CP.UNPROTECT.R, 192.491(c) (192.465(e), 192.9(f)(1), 192.452, 192.453, 192.491)**
 Question Text *Do records adequately document the re-evaluation of non-cathodically protected buried pipelines for areas of active corrosion?*
 Assets Covered **88968 (91)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
343. Question Result, ID, References **Sat, TD.CP.ELECISOLATE.P, 192.605(b)(2) (192.467(a), 192.467(b), 192.467(c), 192.467(d), 192.467(e), 192.9(f)(1), 192.452, 192.453)**
 Question Text *Does the process give adequate guidance for electrically isolating each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?*
 Assets Covered **88968 (91)**
 Result Notes **P-192.453 - Corrosion Control**
- Section X Electrical Isolations, Inspections, Tests and Safeguards**
344. Question Result, ID, References **Sat, TD.CP.ELECISOLATE.R, 192.491(c) (192.467(a), 192.467(b), 192.467(c), 192.467(d), 192.467(e), 192.9(f)(1), 192.452, 192.453, 192.491)**
 Question Text *Do records adequately document electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?*
 Assets Covered **88968 (91)**
 Result Notes **Isolation at two bond locations was verified and at transfer point between Ferndale Gas and Enbridge**
- See Form R for details**
345. Question Result, ID, References **Sat, TD.CP.ELECISOLATE.O, 192.467(a) (192.467(b), 192.467(c), 192.467(d), 192.467(e))**
 Question Text *Are measures performed to ensure electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?*
 Assets Covered **88968 (91)**
 Result Notes **Isolation at two bond locations was verified and at transfer point between Ferndale Gas and Enbridge**
- See Form R for details**
346. Question Result, ID, References **Sat, TD.CP.ELECISOLATETEST.P, 192.605(b)(2) (192.467(d), 192.9(f)(1), 192.452, 192.453)**
 Question Text *Does the process provide adequate guidance to inspect and electrically test to ensure that electrical isolation is adequate?*
 Assets Covered **88968 (91)**
 Result Notes **P-192.453 - Corrosion Control**
- Section X Electrical Isolations, Inspections, Tests and Safeguards**
347. Question Result, ID, References **Sat, TD.CP.ELECISOLATETEST.R, 192.491(c) (192.467(d), 192.9(f)(1), 192.452, 192.453, 192.491)**
 Question Text *Do records adequately document the inspection and electrical testing performed to ensure that electrical isolation is adequate?*
 Assets Covered **88968 (91)**
 Result Notes **Isolation at two bond locations was verified and at transfer point between Ferndale Gas and Enbridge**
- Checked annual records for 2021-2023**

348. Question Result, ID, References **Sat, TD.CP.ELECISOLATETEST.O, 192.467(d)**
Question Text *Do field observations verify that inspection and electrical testing ensured that electrical isolation is adequate?*
Assets Covered **88968 (91)**
Result Notes **Isolation at two bond locations was verified and at transfer point between Ferndale Gas and Enbridge**

See Form R for details

349. Question Result, ID, References **Sat, TD.CP.FAULTCURRENT.P, 192.605(b)(2) (192.467(f), 192.9(f)(1), 192.452, 192.453)**
Question Text *Does the process provide sufficient guidance for determining when protection against damage from fault currents or lightning is needed and how that protection must be installed?*
Assets Covered **88968 (91)**
Result Notes **P-192.453 - Corrosion Control**

Section X Electrical Isolations, Inspections, Tests and Safeguards

350. Question Result, ID, References **NA, TD.CP.FAULTCURRENT.R, 192.491(c) (192.467(f), 192.9(f)(1), 192.452, 192.453, 192.491)**
Question Text *Do records adequately document the installation and inspection of fault current and lightning protection?*
Assets Covered **88968 (91)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

351. Question Result, ID, References **NA, TD.CP.FAULTCURRENT.O, 192.467(f)**
Question Text *Are fault current and lightning protection for the pipeline installed and inspected?*
Assets Covered **88968 (91)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

352. Question Result, ID, References **Sat, TD.CP.RECORDS.P, 192.605(b)(2) (192.491(a), 192.491(b), 192.491(c), 192.9(f)(1), 192.452, 192.453) (also presented in: TD.CP.MONITOR, TD.CP.EXPOSED)**
Question Text *Does the process include records requirements for the corrosion control activities listed in §192.491?*
Assets Covered **88968 (91)**
Result Notes **P-192.453 - Corrosion Control**

Section XVII.C Maintaining Records and Information

353. Question Result, ID, References **Sat, TD.CP.RECORDS.R, 192.491(a) (192.491(b), 192.491(c), 192.9(f)(1), 192.452, 192.453) (also presented in: TD.CP.MONITOR, TD.CP.EXPOSED)**
Question Text *Do records indicate the location of all corrosion control items listed in §192.491(a)?*
Assets Covered **88968 (91)**
Result Notes **All records requested were available**

TD.COAT: External Corrosion - Coatings

354. Question Result, ID, References **Sat, TD.COAT.NEWPIPE.P, 192.605(b)(2) (192.455(a)(1), 192.461(a), 192.461(b), 192.483(a), 192.9(f)(1), 192.452, 192.453)**
Question Text *Does the process require that each buried or submerged pipeline installed after July 31, 1971 be externally coated with a material that is adequate for underground service on a cathodically protected pipeline?*
Assets Covered **88968 (91)**
Result Notes **P-192.453 - Corrosion Control**

Section II

355. Question Result, ID, References **NA, TD.COAT.NEWPIPE.R, 192.491(c) (192.455(a)(1), 192.461(a), 192.461(b), 192.483(a), 192.9(f)(1), 192.452, 192.453, 192.491)**
Question Text *Do records document that each buried or submerged pipeline installed after July 31, 1971 has been externally coated with a suitable coating material?*

Assets Covered 88968 (91)
Result Notes No new buried pipe installed during this timeframe

356. Question Result, ID, References NA, TD.COAT.NEWPIPENOCOAT.R, 192.491(c) (192.455(b), 192.9(f)(1), 192.452, 192.453, 192.491)
Question Text *If a buried or submerged pipeline installed after July 31, 1971 was not installed with an external protective coating do records provide adequate documentation why such a coating was not necessary to protect the pipe from external corrosion?*

Assets Covered 88968 (91)
Result Notes No new buried pipe installed during this timeframe

357. Question Result, ID, References Sat, TD.COAT.NEWPIPEINSTALL.P, 192.605(b)(2) (192.461(c), 192.461(d), 192.461(e), 192.483(a), 192.9(f)(1), 192.452, 192.453)
Question Text *Does the process give adequate guidance for the application and inspection of protective coatings on pipe?*

Assets Covered 88968 (91)
Result Notes P-192.453 - Corrosion Control

Section III Coating Materials

Section IV Pipe Coating Inspections

358. Question Result, ID, References NA, TD.COAT.NEWPIPEINSTALL.R, 192.491(c) (192.461(c), 192.461(d), 192.461(e), 192.483(a), 192.9(f)(1), 192.452, 192.453, 192.491)
Question Text *Do records document that acceptable external protective coating materials have been used and the application and inspection was done in accordance with the written procedures?*

Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

359. Question Result, ID, References NA, TD.COAT.NEWPIPEINSTALL.O, 192.461(a) (192.461(c), 192.461(d), 192.461(e), 192.319(b), 192.483(a))
Question Text *Do field observations confirm pipe protective coating is adequately and properly applied?*

Assets Covered 88968 (91)
Result Notes No such activity/condition was observed during the inspection.

360. Question Result, ID, References Sat, TD.COAT.ASSESS.P, 192.605(b)(2) (192.461(f), 192.461(g), 192.461(h))
Question Text *For onshore steel gas transmission pipelines with a continuous backfill length greater than or equal to 1000 feet, Does the procedure include requirements to assess for external coating damage promptly after the transmission line is backfilled but no later than 6 months?*

Assets Covered 88968 (91)
Result Notes Corrosion Control

Procedure P192.453

Section IV.F Pipe Coating Inspection

361. Question Result, ID, References NA, TD.COAT.ASSESS.R, 192.491(c) (192.461(f), 192.461(g), 192.461(h), 192.461(i))
Question Text *For onshore steel gas transmission pipelines with a continuous backfill length greater than or equal to 1000 feet, do records document an assessment for external coating damage promptly but no later than 6 months after the transmission line was backfilled?*

Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

362. Question Result, ID, References NA, TD.COAT.ASSESS.O, 192.461(c)
Question Text *For onshore steel gas transmission pipelines with a continuous backfill length greater than or equal to 1000 feet, do field observations confirm pipe protective coating is adequately surveyed promptly after backfilling?*

Assets Covered 88968 (91)
Result Notes No such activity/condition was observed during the inspection.

363. Question Result, ID, Sat, TD.COAT.CONVERTPIPE.P, 192.605(b)(2) (192.452(a), 192.455(a), 192.455(b), 192.455(c),
References 192.455(d), 192.461(a))
Question Text *Does the process require that each buried or submerged pipeline that has been converted to gas service and was installed after July 31, 1971, be protected against external corrosion with an adequate coating unless exempted by §192.455(b)?*
Assets Covered 88968 (91)
Result Notes P-192.453 - Corrosion Control

Section II Pipelines that must have External Coating

TD.CPEXPOSED: External Corrosion - Exposed Pipe

364. Question Result, ID, Sat, TD.CPEXPOSED.EXPOSEINSPECT.P, 192.605(b)(2) (192.459, 192.9(f)(1), 192.452, 192.453)
References
Question Text *Does the process require that exposed portions of buried pipeline be examined for external corrosion and coating deterioration, and if external corrosion is found, further examination is required to determine the extent of the corrosion?*
Assets Covered 88968 (91)
Result Notes P-192.453 - Corrosion Control

Section VII Inspection of Exposed Sections of Pipe

365. Question Result, ID, Sat, TD.CPEXPOSED.EXPOSEINSPECT.R, 192.491(c) (192.459, 192.9(f)(1), 192.452, 192.453, 192.491)
References
Question Text *Do records adequately document that exposed buried piping was examined for corrosion and deteriorated coating?*
Assets Covered 88968 (91)
Result Notes New test leads on 11/13/23 on 16-inch line

Pipe exposed and inspected

-1449 mV

No corrosion or coating defects

366. Question Result, ID, NA, TD.CPEXPOSED.EXPOSEINSPECT.O, 192.459
References
Question Text *Is exposed buried piping examined for corrosion and deteriorated coating?*
Assets Covered 88968 (91)
Result Notes No such activity/condition was observed during the inspection.

367. Question Result, ID, Sat, TD.CPEXPOSED.EXTCORRODEEVAL.P, 192.605(b)(2) (192.485(a), 192.485(b), 192.485(c),
References 192.9(f)(1), 192.452, 192.453, 192.712(b))
Question Text *Does the process provide sufficient direction for personnel to evaluate the remaining strength of externally corroded pipe?*
Assets Covered 88968 (91)
Result Notes P-192.453 - Corrosion Control

Section XVI How to Determine Strength of Corroded Pipe

368. Question Result, ID, NA, TD.CPEXPOSED.EXTCORRODEEVAL.R, 192.491(c) (192.485(a), 192.485(b), 192.485(c), 192.9(f)(1),
References 192.452, 192.453, 192.491, 192.712(b))
Question Text *Do records adequately document the evaluation of externally corroded pipe?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

369. Question Result, ID, NA, TD.CPEXPOSED.EXTCORRODEEVAL.O, 192.485(a) (192.485(b), 192.485(c))
References
Question Text *Do field observations confirm externally corroded pipe was properly evaluated?*
Assets Covered 88968 (91)

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

370. Question Result, ID, Sat, TD.CPEXPOSED.EXTCORRODREPAIR.P, 192.605(b)(2) (192.485(a), 192.485(b), 192.485(c),
References 192.9(f)(1), 192.452, 192.453)

Question Text *Does the process give sufficient guidance for personnel to repair or replace pipe that is externally corroded to an extent that there is not sufficient remaining strength in the pipe wall?*

Assets Covered 88968 (91)

Result Notes USPL STP 32-200 ILI Data Evaluation and Resulting Repair Program Procedures

Section 9.3 Criteria for Assessment of Metal Loss

371. Question Result, ID, NA, TD.CPEXPOSED.EXTCORRODREPAIR.R, 192.491(c) (192.485(a), 192.485(b), 192.485(c),
References 192.9(f)(1), 192.452, 192.453, 192.491)

Question Text *Do records document the repair or replacement of pipe that has been externally corroded to an extent that there is not sufficient remaining pipe wall strength?*

Assets Covered 88968 (91)

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

372. Question Result, ID, NA, TD.CPEXPOSED.EXTCORRODREPAIR.O, 192.485(a) (192.485(b), 192.485(c))
References

Question Text *Do field observations confirm the repair or replacement of pipe that has been externally corroded to an extent that there is not sufficient remaining pipe wall strength?*

Assets Covered 88968 (91)

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

TD.ICCG: Internal Corrosion - Corrosive Gas

373. Question Result, ID, Sat, TD.ICCG.CORRGAS.P, 192.605(b)(2) (192.475(a), 192.9(f)(1), 192.452, 192.453)
References

Question Text *Does the process require that the corrosive effect of the gas in the pipeline be investigated?*

Assets Covered 88968 (91)

Result Notes P-192.453 - Corrosion Control

Section XII Mitigating Internal Corrosion

374. Question Result, ID, NA, TD.ICCG.CORRGAS.R, 192.491(c) (192.475, 192.9(f)(1), 192.452, 192.453, 192.491, 192.477,
References 192.478(a), 192.478(b))

Question Text *Do records document the actions taken when corrosive gas is being transported by pipeline?*

Assets Covered 88968 (91)

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

375. Question Result, ID, Sat, TD.ICCG.CORRGASACTION.P, 192.605(b)(2) (192.477, 192.9(f)(1), 192.452, 192.453, 192.478)
References

Question Text *Does the process give adequate direction for actions to be taken if corrosive gas is being transported by pipeline?*

Assets Covered 88968 (91)

Result Notes P-192.453 - Corrosion Control

Section XII.4 Internal Corrosion Mitigation

376. Question Result, ID, NA, TD.ICCG.CORRGASACTION.R, 192.491(c) (192.477, 192.9(f)(1), 192.452, 192.453, 192.491,
References 192.478(a), 192.478(b))

Question Text *Do records document the actions taken when corrosive gas is being transported by pipeline?*

Assets Covered 88968 (91)

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

377. Question Result, ID, NA, TD.ICCG.CORRGASACTION.O, 192.477 (192.478)
References

Question Text *Are adequate actions taken when corrosive gas is being transported by pipeline?*

Assets Covered 88968 (91)

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

378. Question Result, ID, References **Sat, TD.ICCG.CORRCONSTMONIT.P, 192.605(b)(2) (192.478(a), 192.478(b)(1), 192.478(b)(2))**
 Question Text *For onshore gas transmission, does the process require monitoring of the corrosive constituents in the transported gas, and effective mitigation as necessary?*
 Assets Covered **88968 (91)**
 Result Notes **P-192.453 - Corrosion Control**
- Section XII Mitigating Internal Corrosion**
- Section A.1 Product Monitoring**
379. Question Result, ID, References **Sat, TD.ICCG.CORRCONSTMONIT.R, 192.491(c) (192.478(a), 192.478(b)(1), 192.478(b)(2))**
 Question Text *For onshore gas transmission, do operator records indicate monitoring the gas stream for corrosive constituents, effectively mitigating as necessary?*
 Assets Covered **88968 (91)**
 Result Notes **Reviewed monthly chromatograph data that is used for IM threat review**
- No indications of H2S, H2O or other corrosive constituents**
380. Question Result, ID, References **Sat, TD.ICCG.GTEVAL.P, 192.478(a) (192.478(b)(3))**
 Question Text *For onshore gas transmission pipelines, does the internal corrosion management process require an evaluation to ensure corrosive constituents are effectively monitored and mitigated?*
 Assets Covered **88968 (91)**
 Result Notes **P-192.453 - Corrosion Control**
- Section XII.4.ii Mitigating Internal Corrosion**
381. Question Result, ID, References **Sat, TD.ICCG.GTEVAL.R, 192.491(c) (192.478(b)(3))**
 Question Text *For onshore gas transmission pipelines, do records indicate the operator performed an internal corrosion management evaluation at least once per calendar year, not to exceed 15 months?*
 Assets Covered **88968 (91)**
 Result Notes **Annual PIM Threat Review covers corrosion and internal corrosion**
- Reviewed records**
382. Question Result, ID, References **Sat, TD.ICCG.CORRGASREVIEW.P, 192.605(b)(2) (192.478(c))**
 Question Text *For onshore gas transmission pipelines, do procedures include a requirement to review the results from the internal corrosion monitoring and mitigation program at least once each calendar year, but at intervals not exceeding 15 months?*
 Assets Covered **88968 (91)**
 Result Notes **P-192.453 - Corrosion Control**
- Section XII.2 Corrosion Monitoring**
383. Question Result, ID, References **Sat, TD.ICCG.CORRGASREVIEW.R, 192.491(c) (192.478(c))**
 Question Text *For onshore gas transmission pipelines, has the operator conducted annual reviews of the internal corrosion monitoring and mitigation program as required?*
 Assets Covered **88968 (91)**
 Result Notes **Annual PIM Threat Review covers corrosion and internal corrosion**
- Reviewed records**

TD.ICP: Internal Corrosion - Preventive Measures

384. Question Result, ID, References **Sat, TD.ICP.EXAMINE.P, 192.605(b)(2) (192.475(a), 192.475(b), 192.9(f)(1), 192.452, 192.453)**
Question Text *Does the process direct personnel to examine removed pipe for evidence of internal corrosion?*
Assets Covered **88968 (91)**
Result Notes **P-192.453 - Corrosion Control**

Section XII.3.i Inspection of Removed Pipe

385. Question Result, ID, References **NA, TD.ICP.EXAMINE.R, 192.491(c) (192.475(a), 192.475(b), 192.9(f)(1), 192.452, 192.453, 192.491)**
Question Text *Do records document examination of removed pipe for evidence of internal corrosion?*
Assets Covered **88968 (91)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

386. Question Result, ID, References **NA, TD.ICP.EXAMINE.O, 192.475(a) (192.475(b))**
Question Text *Is removed pipe examined for evidence of internal corrosion?*
Assets Covered **88968 (91)**
Result Notes **No such activity/condition was observed during the inspection.**

387. Question Result, ID, References **NA, TD.ICP.CORRGASPRVNT.O, 192.475(a)**
Question Text *If the transportation of corrosive gas is not allowed, is the transportation of corrosive gas prevented?*
Assets Covered **88968 (91)**
Result Notes **No such activity/condition was observed during the inspection.**

388. Question Result, ID, References **Sat, TD.ICP.EVALUATE.P, 192.605(b)(2) (192.9(f)(1), 192.452, 192.453, 192.485(a), 192.485(c), 192.712(b))**
Question Text *Does the process give sufficient guidance for personnel to evaluate the remaining strength of pipe that has been internally corroded?*
Assets Covered **88968 (91)**
Result Notes **P-192.453 - Corrosion Control**

Section XVI How to Determine Strength of Corroded Pipe

389. Question Result, ID, References **NA, TD.ICP.EVALUATE.R, 192.491(c) (192.9(f)(1), 192.452, 192.453, 192.485(a), 192.485(c), 192.491, 192.712(b))**
Question Text *Do records document adequate evaluation of internally corroded pipe?*
Assets Covered **88968 (91)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

390. Question Result, ID, References **Sat, TD.ICP.REPAIRINT.P, 192.491(c) (192.485(a), 192.485(b), 192.9(f)(1), 192.452, 192.453)**
Question Text *Does the process give sufficient guidance for personnel to repair or replace pipe that has internally corroded to an extent that there is no longer sufficient remaining strength in the pipe wall?*
Assets Covered **88968 (91)**
Result Notes **P-192.711 - Repairs, Replacements & Relocations**

Section VI.B Field Inspection / Evaluation of Pipe Defects

Section VIII Permanent Pipeline Repairs

391. Question Result, ID, References **NA, TD.ICP.REPAIRINT.R, 192.485(a) (192.485(b), 192.9(f)(1), 192.452, 192.453, 192.491)**
Question Text *Do records document the repair or replacement of pipe that has been internally corroded to an extent that there is not sufficient remaining strength in the pipe wall?*
Assets Covered **88968 (91)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

392. Question Result, ID, References **NA, TD.ICP.REPAIRINT.O, 192.485(a) (192.485(b))**

Question Text *Do field observations confirm repair or replacement of pipe that has been internally corroded to an extent that there is not sufficient remaining strength in the pipe wall?*

Assets Covered 88968 (91)

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

TD.SP: Special Permits

393. Question Result, ID, References NA, TD.SP.CONDITIONS.P, 190.341(d)(2)

Question Text *Has a process been developed as necessary for complying with the special permit conditions?*

Assets Covered 88968 (91)

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

394. Question Result, ID, References NA, TD.SP.CONDITIONS.R, 190.341(d)(2)

Question Text *Do records demonstrate compliance with all special permit or waiver requirements?*

Assets Covered 88968 (91)

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

395. Question Result, ID, References NA, TD.SP.CONDITIONS.O, 190.341(d)(2)

Question Text *Are special permit requirements being complied with?*

Assets Covered 88968 (91)

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

TD.SCC: Stress Corrosion Cracking

396. Question Result, ID, References NA, TD.SCC.SCCIM.P, 192.911(c) (192.917(a)(1), 192.917(e))

Question Text *Does the integrity management program have a process to identify and evaluate stress corrosion cracking threats to each covered pipeline segment?*

Assets Covered 88968 (91)

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

397. Question Result, ID, References NA, TD.SCC.SCCIM.R, 192.947(d) (192.917(a)(1), 192.917(e))

Question Text *Do integrity management program records document results of studies to identify and evaluate stress corrosion cracking threats to each covered pipeline segment?*

Assets Covered 88968 (91)

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

398. Question Result, ID, References NA, TD.SCC.SCCREPAIR.R, 192.709(a) (192.703(b))

Question Text *Do records document that the operator has properly remediated any occurrences of SCC?*

Assets Covered 88968 (91)

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

TQ.QUIM: Qualification of Personnel - Specific Requirements (IM)

399. Question Result, ID, References Sat, TQ.QUIM.IMREVIEWQUAL.P, 192.915(a) (192.915(b), 192.915(c), 192.935(b), 192.493)

Question Text *Does the process require that operator/vendor personnel (including supervisors and persons responsible for preventive and mitigative measures), who review and evaluate results meet acceptable qualification standards?*

Assets Covered 88968 (91)

Result Notes USPL STP 32-200

Section 5

400. Question Result, ID, Sat, TQ.QUIM.IMREVIEWQUAL.R, 192.947(e) (192.915(a), 192.915(b), 192.915(c), 192.935(b)(1)(i),
References 192.947(d), 192.493)
Question Text *Do records indicate adequate qualification of integrity management personnel?*
Assets Covered 88968 (91)
Result Notes Reviewed training plan and training certificates for In-Line Inspection Specialist
401. Question Result, ID, Sat, TQ.QUIM.IMQC.P, 192.805(b) (ASME B31.8S-2004, Section 12.2(b)(4), 192.935(b)(1)(i),
References 192.907(b), 192.911(l))
Question Text *Does the process require personnel who execute IM program activities to be competent and qualified in accordance with the quality control plan in accordance with ASME B31.8S-2004, Section 12.2(b)(4)?*
Assets Covered 88968 (91)
Result Notes Quality Assurance
- Procedure P192.901l
- Section B Personnel Qualifications and Training Requirements

MO.GO: Gas Pipeline Operations

402. Question Result, ID, Sat, IM.QA.IMMOC.P, 192.911(k) (192.13(d), 192.909(a), 192.909(b)) (also presented in: IM.QA)
References
Question Text *Is the process for management of changes that may impact pipeline integrity adequate?*
Assets Covered 88968 (91)
Result Notes P-192.901k Management of Change Procedure

TD.CPMONITOR: External Corrosion - CP Monitoring

403. Question Result, ID, Sat, TD.CP.RECORDS.P, 192.605(b)(2) (192.491(a), 192.491(b), 192.491(c), 192.9(f)(1), 192.452,
References 192.453) (also presented in: TD.CP, TD.CPEXPOSED)
Question Text *Does the process include records requirements for the corrosion control activities listed in §192.491?*
Assets Covered 88968 (91)
Result Notes P-192.453 - Corrosion Control
- Section XVII.C Maintaining Records and Information
404. Question Result, ID, Sat, TD.CP.RECORDS.R, 192.491(a) (192.491(b), 192.491(c), 192.9(f)(1), 192.452, 192.453) (also
References presented in: TD.CP, TD.CPEXPOSED)
Question Text *Do records indicate the location of all corrosion control items listed in §192.491(a)?*
Assets Covered 88968 (91)
Result Notes All records requested were available

TD.CPEXPOSED: External Corrosion - Exposed Pipe

405. Question Result, ID, Sat, TD.CP.RECORDS.P, 192.605(b)(2) (192.491(a), 192.491(b), 192.491(c), 192.9(f)(1), 192.452,
References 192.453) (also presented in: TD.CP, TD.CPMONITOR)
Question Text *Does the process include records requirements for the corrosion control activities listed in §192.491?*
Assets Covered 88968 (91)
Result Notes P-192.453 - Corrosion Control
- Section XVII.C Maintaining Records and Information
406. Question Result, ID, Sat, TD.CP.RECORDS.R, 192.491(a) (192.491(b), 192.491(c), 192.9(f)(1), 192.452, 192.453) (also
References presented in: TD.CP, TD.CPMONITOR)
Question Text *Do records indicate the location of all corrosion control items listed in §192.491(a)?*
Assets Covered 88968 (91)
Result Notes All records requested were available

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