

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	9011_J.R. Simplot_PA_2025	Operator(s)	J.R. SIMPLOT COMPANY (32395)	Plan Submitted	02/03/2025
		Lead	Jason Hoxit	Plan Approval	02/03/2025 by Dennis Ritter
Status	LOCKED	Observer(s)	David Cullom, Anthony Dorrrough, Derek Norwood, Scott Anderson, John Trier, Marina Rathbun, Tom Green	All Activity Start	09/08/2025
Start Year	2025	Director	Scott Rukke, Dennis Ritter	All Activity End	09/09/2025
System Type	GT			Inspection Submitted	09/25/2025
Protocol Set ID	WA.GT.2024.02			Inspection Approval	09/25/2025 by Dennis Ritter

Inspection Summary

Inspection Scope and Summary

This Public Awareness (PA) inspection for J.R. Simplot Company included reviewing procedures from the operator's operations and maintenance manual (OM Manual) and Public Awareness Plan (PAP), as well as reviewing the operator's records for years 2021-2024. The previous PA inspection was conducted on July 28, 2021, with no areas of concern, probable violations, or recommended follow-up actions.

J.R. Simplot Company's potato processing facility is in Moses Lake, Washington, and includes a biogas digester, a non-jurisdictional compressor, and 1.4 miles of 8-inch high density polyethylene biogas transmission pipeline in a Class 1 location. The pipeline is pressure tested at 90 psig and operates at 15 psig MAOP with no direct-relief or worker/monitor system for overpressure protection.

Facilities visited and Total AFOD

Facilities were not visited for the public awareness inspection. The audit was conducted remotely via Microsoft Teams from 9/08-9/09/2025. This inspection was 2 AFODs.

Summary of Significant Findings

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

Primary Operator contacts and/or participants

Andrew Erickson, Environmental Manager, J.R. Simplot Company

Matthew Schmidt, Process Water Treatment Coordinator, J.R. Simplot Company

Doug Erickson, Compliance Program Manager, EverLine Compliance

Operator executive contact and mailing address for any official correspondence

Esiquiel Rodriguez

Regional Unit Director

J.R. Simplot Company

1099 West Front Street

Boise, ID, 83702

Scope (Assets)

Short # Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1. 86257	JR Simplot	unit	86257	Compressor Stations Bottle/Pipe - Holders Vault Service Line Gas Storage Field (Aboveground) GOM OCS Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric AMAOP CDA Abandoned	46	46	46	46	100.0%

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

Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	86257	--	PD	P, R, O, S	Detail	--

Plan Implementations

#	Activity Name	SMAR T Act#	Start Date	End Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Inspected	Total	Required % Complete
1.	Public Awareness	--	09/08/2025	--		all planned questions	all assets	all types	46	46	46	46	100.0%

- 1. Since questions may be implemented in multiple activities, but answered only once, questions may be represented more than once in this table.
- 2. Percent completion excludes unanswered questions planned as "always observe".

Forms

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1.	Attendance List	Public Awareness	COMPLETED	09/08/2025	Public Awareness	86257

Results (all values, 46 results)

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

EP.ERG: Emergency Response

1. Question Result, ID, [Sat, EP.ERG.LIAISON.R, 192.603\(b\) \(192.615\(c\)\(1\), 192.615\(c\)\(2\), 192.615\(c\)\(3\), 192.615\(c\)\(4\), 192.616\(c\), 192.9\(d\), 192.9\(e\), ADB-2005-03\)](#) (also presented in: PD.PA)
- Question Text *Do records indicate that liaison has been established and maintained with appropriate fire, police, other public officials, and 911 emergency call centers?*
- Assets Covered [86257](#)
- Result Notes Reviewed mailing lists for emergency officials that included: Washington State Patrol (WSP), Grant County FD, City of Moses Lake FD, Moses Lake City Crime Prevention, and City of Moses Lake PD. Reviewed mailing lists for local public officials that included: Grant County District Court, Quincy Town Clerk, Mattawa Town Hall, Grant County Development Services, and Multi-Agency Communications.
- Reviewed a sample of monthly Local Emergency Planning Committee (LEPC) meeting records between 2021-2024, where changes to liaisons would be announced and then updated by J.R. Simplot. That sample included:
- 2021: LEPC held online via WebEx and in-person at Grant County Fire District 3 in Quincy, WA, on October 14, 2021. Reviewed attendance from monthly meeting.
- 2022: LEPC held online via WebEx and in-person at J.R. Simplot in Moses Lake, WA, on June 6, 2022. Reviewed attendance from meeting.
- 2023: LEPC held online via WebEx and in-person at J.R. Simplot in Moses Lake, WA, on April 13, 2023. Reviewed attendance.
- 2024: LEPC held online via Microsoft Teams and in-person at Moses Lake Fire Department in Moses Lake, WA, on March 14, 2024. Reviewed attendance for LEPC.

MO.GO: Gas Pipeline Operations

2. Question Result, ID, [Sat, MO.GO.CONTSURVEILLANCE.P, 192.605\(e\) \(192.613\(a\), 192.613\(b\), 192.703\(b\), 192.703\(c\)\)](#) (also References presented in: MO.GOCLASS, PD.RW)
- Question Text *Are there processes for performing continuing surveillance of pipeline facilities, and also for reconditioning, phasing out, or reducing the MAOP in a pipeline segment that is determined to be in unsatisfactory condition but on which no immediate hazard exists?*
- Assets Covered [86257](#)
- Result Notes OM Manual, Section 8.3, Continuing Surveillance 192.613, Pages 8-4 and 8-5.
3. Question Result, ID, [Sat, MO.GO.CONTSURVEILLANCE.R, 192.709\(c\) \(192.613\(a\), 192.613\(b\), 192.703\(b\), 192.703\(c\)\)](#) (also References presented in: MO.GOCLASS, PD.RW)
- Question Text *Do records indicate performance of continuing surveillance of facilities as required, and also the reconditioning, phasing out, or MAOP reduction in any pipeline segment that was determined to be in unsatisfactory condition but on which no immediate hazard existed?*
- Assets Covered [86257](#)
- Result Notes J.R. Simplot patrolled its transmission line in April and October of each year. Reviewed the following sample of pipeline patrol records (Form 3(a)):
- 2021: Reviewed walking patrol record from 10/25/21 performed by Matthew Schmidt. No construction, erosion, or leak found during patrol.
- 2022: Reviewed walking patrol record from 4/21/22 conducted by Matthew Schmidt. No construction, erosion, or leak found during patrol.
- 2023: Reviewed walking patrol record from 4/13/23 performed by Matthew Schmidt. No construction, erosion, or leak found during patrol.
- 2024: Reviewed walking patrol record from 10/03/24 performed by Matthew Schmidt. Construction activity documented and no erosion or leak found.
- Reviewed the following leakage survey records (Form 3(b)):

2021: Matthew Schmidt conducted leak survey of line on 4/20/21 using calibrated Sensit Trak-It (#4638). No gas detected.

2022: Matthew Schmidt conducted leak survey of line on 3/23/22 using calibrated Sensit Trak-It III (#9419). No gas detected.

2023: Matthew Schmidt conducted leak survey of line on 4/23/23 using calibrated Sensit Trak-It III (#9419). No gas detected.

2024: Matthew Schmidt conducted leak survey of line on 4/17/24 using calibrated Sensit Trak-It (4638). No gas detected.

Reviewed OQs for Matthew Schmidt (EWN-714334). Qualification is current for Task 016G – Inspection of Surface (Right of Way) and Leak Survey of Gas Pipelines (1:0).

4. Question Result, ID, **NA, MO.GO.CONTSURVEILLANCE.O, 192.613(a) (192.613(b), 192.703(a), 192.703(b), 192.703(c))** (also References presented in: MO.GOCLASS, PD.RW)
Question Text *Are unsatisfactory conditions being captured and addressed by continuing surveillance of facilities and the pipeline as required by 192.613?*
Assets Covered **86257**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review. There were no unsatisfactory conditions captured during the 2021-2024 inspection cycle.**

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

5. Question Result, ID, References **Sat, MO.RW.LEAKRECORDS.P**, (also presented in: PD.RW)
Question Text *Does the operator have procedures to prepare and maintain gas leak records containing all information required by WAC 480-93-178?*
Assets Covered **86257**
Result Notes **OM Manual, Section 7.12, Gas Leak Records WAC 480-93-187, Page 7-16.**

PD.DP: Damage Prevention

6. Question Result, ID, References **Sat, PD.DP.PDPROGRAM.P, 192.614(a)**
Question Text *Is a damage prevention program approved and in place?*
Assets Covered **86257**
Result Notes **OM Manual, Section 18, Damage Prevention, Pages 18-1 through 18-10.**
7. Question Result, ID, References **Sat, PD.DP.ONECALL.P, 192.614(b)**
Question Text *Does the process require participation in qualified one-call systems?*
Assets Covered **86257**
Result Notes **OM Manual, Section 18.1, One Call System 192.614, Pages 18-1 and 18-2.**
8. Question Result, ID, References **Sat, PD.DP.EXCAVATEMARK.P, 192.614(c)(5)**
Question Text *Does the process require marking proposed excavation sites to CGA Best Practices or use more stringent and accurate requirements?*
Assets Covered **86257**
Result Notes **OM Manual, Section 18.4, Temporary Marking of Pipelines, Pages 18-5 and 18-6.**
9. Question Result, ID, References **Sat, PD.DP.EXCAVATEMARK.R, 192.614(c)(5)**
Question Text *Do records indicate that marking proposed excavation sites was completed within two business days and in accordance with RCW 19.122?*
Assets Covered **86257**

Result Notes Reviewed locate records from 2021-2024. J.R. Simplot located proposed excavation sites within two business days or within a time mutually agreed upon between the operator and the excavator requesting the utility locate information.

Reviewed OQs for Matthew Schmidt (located 2021-2024) and Hector Garcia (located in 2021).

Matthew Schmidt (EWN-714334): Task 84807 – EWN-0CBT-Locate Line (14:1)

Hector Garcia (EWN-722670): Task 84807 - EWN-CBT-Locate Line (14:1)

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

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

Assets Covered 86257

Result Notes OM Manual, Section 18.1, One Call System 192.614, Page 18-1. OM Manual, Section 18.8, Local Excavators 192.614(c)(1), Page 18-9. PAP, Section 5.2, Third-Party Vendors Used to Identify Stakeholders, Page 5-1.

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

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

Assets Covered 86257

Result Notes OM Manual, Section 18.1, One Call System 192.614, Page 18-1, Paragraph 3. PAP, Section 6.10, One Call Centers, Page 6-8.

12. Question Result, ID, References **NA, PD.DP.ONECALL.O, 192.614(c)(3)**

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

Assets Covered 86257

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

13. Question Result, ID, References **Sat, PD.DP.PDPROGRAM.R, 192.614(c) (Appendix F to Part 112)**

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

Assets Covered 86257

Result Notes J.R. Simplot is a member of a One-Call system. Reviewed locate records from 2021-2024. The operator located proposed excavation sites within two business days or within a time mutually agreed upon between the operator and the excavator requesting the utility locate information.

Reviewed the operator's excavator list, which uses excavator information from One-Call tickets and SIC codes to pull excavator information, as well as the affected public list. I reviewed the mailers that are distributed to the four stakeholder audiences from 2021-2024.

14. 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 86257

Result Notes OM Manual, Section 7.1, Pipeline Patrol: Transmission Lines 192.705, Page 7-1. The operator uses Form - 3(a) to document patrols.

OM Manual, Section 7.4, Leakage Survey: Transmission Pipelines 192.706, Page 7-4. The operator uses Form - 3(b) to document leak surveys.

No integrity assessments - not an integrity pipeline.

15. 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 86257

Result Notes J.R. Simplot patrolled its transmission line in April and October of each year. Reviewed the following sample of pipeline patrol records (Form 3(a)):

2021: Reviewed walking patrol record from 10/25/21 performed by Matthew Schmidt. No construction, erosion, or leak found during patrol.

2022: Reviewed walking patrol record from 4/21/22 conducted by Matthew Schmidt. No construction, erosion, or leak found during patrol.

2023: Reviewed walking patrol record from 4/13/23 performed by Matthew Schmidt. No construction, erosion, or leak found during patrol.

2024: Reviewed walking patrol record from 10/03/24 performed by Matthew Schmidt. Construction activity documented and no erosion or leak found.

Reviewed the following leakage survey records (Form 3(b)):

2021: Matthew Schmidt conducted leak survey of line on 4/20/21 using calibrated Sensit Trak-It (#4638). No gas detected.

2022: Matthew Schmidt conducted leak survey of line on 3/23/22 using calibrated Sensit Trak-It III (#9419). No gas detected.

2023: Matthew Schmidt conducted leak survey of line on 4/23/23 using calibrated Sensit Trak-It III (#9419). No gas detected.

2024: Matthew Schmidt conducted leak survey of line on 4/17/24 using calibrated Sensit Trak-It (4638). No gas detected.

Reviewed OQs for Matthew Schmidt (EWN-714334). Qualification is current for Task 016G – Inspection of Surface (Right of Way) and Leak Survey of Gas Pipelines (1:0).

16. Question Result, ID, References **Sat, PD.DP.NOTICETOEXCAVATOR.P,**
Question Text *Is there a process to provide the required information to excavators who damage pipeline facilities?*
Assets Covered **86257**
Result Notes **OM Manual, Section 18.10, Damage Reporting WAC 480-93-200, Page 18-10.**
17. Question Result, ID, References **NA, PD.DP.NOTICETOEXCAVATOR.R,**
Question Text *Do records indicate that the operator provides the required information to excavators who damage pipeline facilities?*
Assets Covered **86257**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review. No damage to pipeline facilities during 2021-2024 inspection cycle.**
18. Question Result, ID, References **Sat, PD.DP.COMMISSIONREPORT.P,**
Question Text *Is there a process to report to the commission when the operator or its contractor observes or becomes aware of the activities described in WAC 480-93-200(9)?*
Assets Covered **86257**
Result Notes **OM Manual, Section 18.10, Damage Reporting WAC 480-93-200, Page 18-10, Row 3 of table.**
19. Question Result, ID, References **NA, PD.DP.COMMISSIONREPORT.R,**
Question Text *Do records indicate the operator reports to the commission when the operator or its contractor observes or becomes aware of the activities described in WAC 480-93-200(9)?*
Assets Covered **86257**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
20. Question Result, ID, References **NA, PD.DP.REBURIALINSPECT.R,**

Question Text *When a third party exposes a pipeline owned by the operator, does the operator have a record showing they examined the pipeline for damage in the vicinity of the excavation?*

Assets Covered 86257

Result Notes No such event occurred, or condition existed, in the scope of inspection review. No pipeline exposures by third-party excavators during 2021-2024 inspection cycle.

PD.PA: Public Awareness

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

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

Assets Covered 86257

Result Notes OM Manual, Section 3.1, Pipeline System(s) Description, Page 3-5. PAP, Section 4.1, Pipeline System(s) Description, Page 4-1.

22. Question Result, ID, References Sat, PD.PA.AUDIENCEID.P, 192.616(d) (192.616(e), 192.616(f), API RP 1162 Section 2.2, API RP 1162 Section 3)

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

Assets Covered 86257

Result Notes PAP, Section 5.1, Identify the Four Stakeholder Audiences, Page 5-1. PAP, Section 5.2, Third-Party Vendors Used to Identify Stakeholders, Page 5-1.

23. Question Result, ID, References Sat, PD.PA.MGMTSUPPORT.P, 192.616(a) (API RP 1162 Section 2.5, API RP 1162 Section 7.1)

Question Text *Does the operator's program documentation demonstrate management support?*

Assets Covered 86257

Result Notes PAP, Section 1.5, Management Commitment & Support, Page 1-4.

24. Question Result, ID, References Sat, PD.PA.PROGRAM.P, 192.616(a) (192.616(h))

Question Text *Has the continuing public education (awareness) program been established as required?*

Assets Covered 86257

Result Notes OM Manual, Section 18.5, Public Education 192.616, Page 18-7. The PAP dates back to 8/14/2012 according to PAP, Section 10, Form 2 Public Awareness Program Revision Log, Page 10-3. During the 2021-2024 inspection cycle, the PAP was reviewed by EverLine Compliance on 5/24/2021, 5/20/2022, 5/12/2023, and 5/09/2024.

25. Question Result, ID, References Sat, PD.PA.AUDIENCEID.R, 192.616(d) (192.616(e), 192.616(f), API RP 1162 Section 2.2, API RP 1162 Section 3)

Question Text *Do records identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents to which it sends public awareness materials and messages?*

Assets Covered 86257

Result Notes Reviewed mailing lists for emergency officials, local public officials, excavators, and affected public. Reviewed monthly LEPC meeting records. Reviewed the mailers that were distributed to the four stakeholder audiences from 2021-2024. Reviewed Public Awareness Recordkeeping Reports from 2021-2023 and the 2024 Public Awareness Campaign Report.

2021 Public Awareness Recordkeeping Report: 666 total mailers sent on 9/28/21. The 666 total broken down into: 326 excavation & construction, 58 public officials/general government, 8 emergency officials, 15 agricultural production & animal specialty, 89 schools & education services, 170 farmers, and affected public N/A.

2022 Public Awareness Recordkeeping Report: 830 total mailers sent on 12/01/22. The 830 total is broken down into: 240 excavators, 125 public officials/emergency officials/schools, 173 agricultural production & farmers, and 292 affected public.

2023 Public Awareness Recordkeeping Report: 421 total mailers sent on 11/14/23. The 421 total is broken down into: 278 Excavators, 30 emergency officials, 113 public officials, and affected public N/A.

2024 Public Awareness Campaign Report: 314 total mailers sent on 12/19/24. The 314 total broken down into: excavators 285, emergency officials 5, public officials 5, and affected public 19.

26. Question Result, ID, References **Sat, PD.PA.MESSAGES.P, 192.616(c) (API RP 1162 Section 3, API RP 1162 Section 4, API RP 1162 Section 5)**
Question Text *Does the program define the combination of messages, delivery methods, and delivery frequencies to comprehensively reach all affected stakeholder audiences in all areas where gas is transported?*
Assets Covered **86257**
Result Notes **PAP, Section 8, Delivery Methods/Frequencies, Pages 8-1 through 8-3.**
27. Question Result, ID, References **Sat, PD.PA.SUPPLEMENTAL.P, 192.616(c) (API RP 1162 Section 6.2)**
Question Text *Were relevant factors considered to determine the need for supplemental public awareness program enhancements for each stakeholder audience, as described in API RP 1162?*
Assets Covered **86257**
Result Notes **PAP, Section 9.8, Supplemental Enhancements, Pages 9-7 through 9-10.**
28. Question Result, ID, References **Sat, PD.PA.EDUCATE.R, 192.616(d) (192.616(f))**
Question Text *Do records indicate delivered messages specifically included provisions to educate the public, emergency officials, local public officials, and excavators on the categories defined in §192.616(d)?*
Assets Covered **86257**
Result Notes **Reviewed 2021-2022 Affected Public Awareness Brochures; Excavator Awareness Brochures; Public Official and Emergency Official Awareness Brochures; and Farmers and Ranchers Awareness Brochures.**

Reviewed 2023-2024 Affected Public Awareness Brochures; Excavator Awareness Brochures; Public Official Awareness Brochures; and Emergency Officials Awareness Brochures.
29. Question Result, ID, References **Sat, PD.PA.LOCATIONMESSAGE.R, 192.616(e) (192.616(f))**
Question Text *Were messages developed and delivered to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations?*
Assets Covered **86257**
Result Notes **Reviewed 2021-2022 Affected Public Awareness Brochures; Excavator Awareness Brochures; Public Official and Emergency Official Awareness Brochures; and Farmers and Ranchers Awareness Brochures.**

Reviewed 2023-2024 Affected Public Awareness Brochures; Excavator Awareness Brochures; Public Official Awareness Brochures; and Emergency Officials Awareness Brochures.
30. Question Result, ID, References **Sat, PD.PA.MESSAGEFREQUENCY.R, 192.616(c) (API RP 1162 Table 2-1, API RP 1162 Table 2-2, API RP 1162 Table 2-3)**
Question Text *Did the delivery of materials and messages meet or exceed the baseline delivery frequencies specified in API RP 1162, Table 2-1 through Table 2.3?*
Assets Covered **86257**
Result Notes **Delivery frequencies were met for the affected public, emergency officials, and excavators/contractors. The operators delivery frequency to local public officials was annual, which is more frequent than required in API RP 1162, Table 2-1.**
31. Question Result, ID, References **Sat, PD.PA.LANGUAGE.P, 192.616(g) (API RP 1162 Section 2.3.1)**
Question Text *Does the program require that materials and messages be provided in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?*
Assets Covered **86257**
Result Notes **PAP, Section 6.2, Language, Page 6-1.**
32. Question Result, ID, References **Sat, PD.PA.LANGUAGE.R, 192.616(g) (API RP 1162 Section 2.3.1)**
Question Text *Were materials and messages developed and delivered in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?*

Assets Covered 86257

Result Notes Reviewed materials in Spanish for Affected Public Awareness Brochure; Excavator Awareness Brochure; Public Official and Emergency Official Awareness Brochure; Public Official Awareness Brochure; Emergency Officials Awareness Brochure; and Farmers and Ranchers Awareness Brochure.

33. Question Result, ID, References Sat, PD.PA.EVALPLAN.P, 192.616(i) (192.616(c), API RP 1162 Section 8, API RP 1162 Appendix E)

Question Text *Does the program include a process that specifies how program implementation and effectiveness will be periodically evaluated?*

Assets Covered 86257

Result Notes PAP, Section 9.7, Monitoring Program Effectiveness, Page 9-6. PAP, Section 9.11, Program Evaluation, Page 9-11. PAP, Section 9.12, Elements of Evaluation Plan, Page 9-11. PAP, Section 9.13, Measuring Program Implementation & Effectiveness, Pages 9-12 through 9-16.

34. Question Result, ID, References Sat, PD.PA.EVALIMPL.R, 192.616(c) (192.616(i), API RP 1162 Section 8.3)

Question Text *Has an audit or review of the operator's program implementation been performed annually since the program was developed?*

Assets Covered 86257

Result Notes Reviewed 2021-2023 Public Awareness Recordkeeping Reports and 2024 Public Awareness Campaign Report. Reviewed PAP Review Log (Form 1) and PAP Revision Log (Form 2) for 2021-2024. The program reviews were completed annually by EverLine Compliance on 5/24/2021, 5/20/2022, 5/12/2023, and 5/09/2024.

35. Question Result, ID, References Sat, PD.PA.AUDITMETHODS.R, 192.616(c) (192.616(i), API RP 1162 Section 8.3)

Question Text *Was one or more of the three acceptable methods (i.e., internal assessment, 3rd-party contractor review, or regulatory inspections) used to complete the annual audit or review of program implementation?*

Assets Covered 86257

Result Notes EverLine Compliance conducted the annual program reviews from 2021-2024.

36. Question Result, ID, References Sat, PD.PA.PROGRAMIMPROVE.R, 192.616(c) (API RP 1162 Section 8.3)

Question Text *Were changes made to improve the program and/or the implementation process based on the results and findings of the annual audit(s)?*

Assets Covered 86257

Result Notes There were no changes made to the PAP during the 2021-2024 inspection cycle.

37. Question Result, ID, References Sat, PD.PA.EVALEFFECTIVENESS.R, 192.616(c) (API RP 1162 Section 8.4)

Question Text *Have effectiveness evaluation(s) of the program been performed for all stakeholder groups in all notification areas along all systems covered by the program?*

Assets Covered 86257

Result Notes Reviewed monthly LEPC meeting records. Reviewed Public Awareness Recordkeeping Reports from 2021-2023 and the 2024 Public Awareness Campaign Report. During the 2021-2024 inspection cycle, 2,231 mailers were sent out to all stakeholder groups and zero response cards were returned. Effectiveness questionnaires sent to the stakeholder groups are Forms 8-11 found in Section 10 of the PAP.

38. Question Result, ID, References Sat, PD.PA.MEASUREOUTREACH.R, 192.616(c) (API RP 1162 Section 8.4.1)

Question Text *In evaluating effectiveness, was actual program outreach for each stakeholder audience tracked?*

Assets Covered 86257

Result Notes Reviewed monthly LEPC meeting records with attendance lists. Reviewed Public Awareness Recordkeeping Reports from 2021-2023 and the 2024 Public Awareness Campaign Report.

2021 Public Awareness Recordkeeping Report: 666 total mailers sent on 9/28/21. The 666 total is broken into: 326 excavation & construction, 58 public officials/general government, 8 emergency officials, 15 agricultural production & animal specialty, 89 schools & education services, 170 farmers, and affected public N/A. There were zero responses received for the categories "Response Cards returned filled out," "Response Cards not filled out but returned," and "Returned Mail (incorrect/insufficient address)."

2022 Public Awareness Recordkeeping Report: 830 total mailers sent on 12/01/22. The 830 total is broken into: 240 excavators, 125 public officials/emergency officials/schools, 173 agricultural production & farmers, and 292 affected public. There were zero responses received for the categories "Response

Cards returned filled out," "Response Cards not filled out but returned," and "Returned Mail (incorrect/insufficient address)."

2023 Public Awareness Recordkeeping Report: 421 total mailers sent on 11/14/23. The 421 total is broken down into: 278 Excavators, 30 emergency officials, 113 public officials, and affected public N/A. There were zero responses received for the categories "Response Card #1-Excavators," "Response Card #2-Public Officials, Emergency Officials, General Government, and Schools," "Response Card#3-Agricultural Production," and "Response Card#4-Residents."

2024 Public Awareness Campaign Report: 314 total mailers sent on 12/19/24. The 314 total is broken down into: excavators 285, emergency officials 5, public officials 5, and affected public 19. There were zero responses received from the 2024 mailers.

39. Question Result, ID, References Sat, PD.PA.MEASUREUNDERSTANDABILITY.R, 192.616(c) (API RP 1162 Section 8.4.2)
Question Text *In evaluating program effectiveness, was the percentage of each stakeholder audience that understood and retained the key information from the messages determined?*
Assets Covered 86257
Result Notes Reviewed Public Awareness Recordkeeping Reports from 2021-2023 and the 2024 Public Awareness Campaign Report. During the 2021-2024 inspection cycle, J.R. Simplot did not receive any response cards back from the stakeholder audiences.
40. Question Result, ID, References Sat, PD.PA.MEASUREBEHAVIOR.R, 192.616(c) (API RP 1162 Section 8.4.3)
Question Text *In evaluating program effectiveness, was evaluation made of whether appropriate preventive, response, and mitigative behaviors were understood and likely to be exhibited?*
Assets Covered 86257
Result Notes Reviewed 2021-2024 annual reports, which shows zero leaks and zero third-party/mechanical damage. 2024 annual report shows that there were 55 excavation tickets and zero excavation damages. Reviewed monthly LEPC meeting records. Reviewed Public Awareness Recordkeeping Reports from 2021-2023 and the 2024 Public Awareness Campaign Report. During the 2021-2024 inspection cycle, 2,231 mailers were sent out to all stakeholder audiences and zero response cards were returned (Forms 8-11). During the 2021-2024 inspection cycle, there were zero near misses, zero excavation damages, and zero pipeline exposures by third-party excavators.
41. Question Result, ID, References Sat, PD.PA.MEASUREBOTTOM.R, 192.616(c) (API RP 1162 Section 8.4.4)
Question Text *Were bottom-line results of the program measured by tracking third-party incidents and consequences including: (1) near misses, (2) excavation damages resulting in pipeline failures, (3) excavation damages that do not result in pipeline failures?*
Assets Covered 86257
Result Notes Reviewed 2021-2024 annual reports. During the 2021-2024 inspection cycle, there were zero near misses, zero excavation damages, and zero pipeline exposures by third-party excavators. Reviewed Periodic Compliance Meeting Checklist from 4/24/2025 between EverLine and J.R. Simplot that was implemented in 2025 and set to be conducted biannually.
42. Question Result, ID, References Sat, PD.PA.CHANGES.R, 192.616(c) (API RP 1162 Section 2.7 (Step 12), API RP 1162 Section 8.5)
Question Text *Were needed changes and/or modifications to the program identified and documented based on the results and findings of the program effectiveness evaluations?*
Assets Covered 86257
Result Notes Reviewed 2021-2024 annual reports, which shows zero leaks and zero third-party/mechanical damage. 2024 annual report shows that there were 55 excavation tickets and zero excavation damages. Reviewed monthly Local Emergency Planning Committee (LEPC) meeting records. Reviewed 2021-2023 Public Awareness Recordkeeping Reports and 2024 Public Awareness Campaign Report, which show that J.R. Simplot did not receive any response cards from all stakeholder audiences during the 2021-2024 inspection cycle (Forms 8-11). During the 2021-2024 inspection cycle, there were zero near misses, zero excavation damages, and zero pipeline exposures by third-party excavators. Reviewed PAP Review Log (Form 1) and PAP Revision Log (Form 2) for 2021-2024. The PAP reviews were completed annually by EverLine Compliance and there were no changes made to the PAP during the 2021-2024 inspection cycle.

PD.SP: Special Permits

43. Question Result, ID, References NA, PD.SP.REPAIR.P, 190.341(d)(2)

Question Text *If the operator operates a pipeline under a special permit have the processes been modified to incorporate the requirements of the permit for required repairs?*

Assets Covered 86257

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

44. Question Result, ID, References NA, PD.SP.BESTPRACTICE.P, 190.341(d)(2)

Question Text *If the operator operates a pipeline under a special permit, do the processes specify implementation of applicable CGA Best Practices?*

Assets Covered 86257

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

45. Question Result, ID, References NA, PD.SP.REPAIR.R, 190.341(d)(2)

Question Text *If the operator operates a pipeline under a special permit, do records indicate that required repairs were performed?*

Assets Covered 86257

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

46. Question Result, ID, References NA, PD.SP.REQUIREMENT.O, 190.341(d)(2)

Question Text *If the operator operates a pipeline under a special permit verify that the requirements have been implemented.*

Assets Covered 86257

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

MO.GOCLASS: Gas Pipeline Class Location

47. Question Result, ID, References Sat, MO.GO.CONTSURVEILLANCE.P, 192.605(e) (192.613(a), 192.613(b), 192.703(b), 192.703(c)) (also presented in: MO.GO, PD.RW)

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

Assets Covered 86257

Result Notes OM Manual, Section 8.3, Continuing Surveillance 192.613, Pages 8-4 and 8-5.

48. Question Result, ID, References Sat, MO.GO.CONTSURVEILLANCE.R, 192.709(c) (192.613(a), 192.613(b), 192.703(b), 192.703(c)) (also presented in: MO.GO, PD.RW)

Question Text *Do records indicate performance of continuing surveillance of facilities as required, and also the reconditioning, phasing out, or MAOP reduction in any pipeline segment that was determined to be in unsatisfactory condition but on which no immediate hazard existed?*

Assets Covered 86257

Result Notes J.R. Simplot patrolled its transmission line in April and October of each year. Reviewed the following sample of pipeline patrol records (Form 3(a)):

2021: Reviewed walking patrol record from 10/25/21 performed by Matthew Schmidt. No construction, erosion, or leak found during patrol.

2022: Reviewed walking patrol record from 4/21/22 conducted by Matthew Schmidt. No construction, erosion, or leak found during patrol.

2023: Reviewed walking patrol record from 4/13/23 performed by Matthew Schmidt. No construction, erosion, or leak found during patrol.

2024: Reviewed walking patrol record from 10/03/24 performed by Matthew Schmidt. Construction activity documented and no erosion or leak found.

Reviewed the following leakage survey records (Form 3(b)):

2021: Matthew Schmidt conducted leak survey of line on 4/20/21 using calibrated Sensit Trak-It (#4638). No gas detected.

2022: Matthew Schmidt conducted leak survey of line on 3/23/22 using calibrated Sensit Trak-It III (#9419). No gas detected.

2023: Matthew Schmidt conducted leak survey of line on 4/23/23 using calibrated Sensit Trak-It III (#9419). No gas detected.

2024: Matthew Schmidt conducted leak survey of line on 4/17/24 using calibrated Sensit Trak-It (4638). No gas detected.

Reviewed OQs for Matthew Schmidt (EWN-714334). Qualification is current for Task 016G – Inspection of Surface (Right of Way) and Leak Survey of Gas Pipelines (1:0).

49. Question Result, ID, **NA, MO.GO.CONTSURVEILLANCE.O, 192.613(a) (192.613(b), 192.703(a), 192.703(b), 192.703(c))** (also References presented in: MO.GO, PD.RW)
Question Text *Are unsatisfactory conditions being captured and addressed by continuing surveillance of facilities and the pipeline as required by 192.613?*
Assets Covered **86257**
Result Notes No such event occurred, or condition existed, in the scope of inspection review. There were no unsatisfactory conditions captured during the 2021-2024 inspection cycle.

PD.PA: Public Awareness

50. Question Result, ID, **Sat, EP.ERG.LIAISON.R, 192.603(b) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), 192.9(d), 192.9(e), ADB-2005-03)** (also presented in: EP.ERG)
Question Text *Do records indicate that liaison has been established and maintained with appropriate fire, police, other public officials, and 911 emergency call centers?*
Assets Covered **86257**
Result Notes Reviewed mailing lists for emergency officials that included: Washington State Patrol (WSP), Grant County FD, City of Moses Lake FD, Moses Lake City Crime Prevention, and City of Moses Lake PD. Reviewed mailing lists for local public officials that included: Grant County District Court, Quincy Town Clerk, Mattawa Town Hall, Grant County Development Services, and Multi-Agency Communications.

Reviewed a sample of monthly Local Emergency Planning Committee (LEPC) meeting records between 2021-2024, where changes to liaisons would be announced and then updated by J.R. Simplot. That sample included:

2021: LEPC held online via WebEx and in-person at Grant County Fire District 3 in Quincy, WA, on October 14, 2021. Reviewed attendance from monthly meeting.

2022: LEPC held online via WebEx and in-person at J.R. Simplot in Moses Lake, WA, on June 6, 2022. Reviewed attendance from meeting.

2023: LEPC held online via WebEx and in-person at J.R. Simplot in Moses Lake, WA, on April 13, 2023. Reviewed attendance.

2024: LEPC held online via Microsoft Teams and in-person at Moses Lake Fire Department in Moses Lake, WA, on March 14, 2024. Reviewed attendance for LEPC.

PD.RW: ROW Markers, Patrols, Monitoring

51. Question Result, ID, **Sat, MO.GO.CONTSURVEILLANCE.P, 192.605(e) (192.613(a), 192.613(b), 192.703(b), 192.703(c))** (also References presented in: MO.GO, MO.GOCLASS)
Question Text *Are there processes for performing continuing surveillance of pipeline facilities, and also for reconditioning, phasing out, or reducing the MAOP in a pipeline segment that is determined to be in unsatisfactory condition but on which no immediate hazard exists?*
Assets Covered **86257**
Result Notes OM Manual, Section 8.3, Continuing Surveillance 192.613, Pages 8-4 and 8-5.

52. Question Result, ID, [Sat, MO.GO.CONTSURVEILLANCE.R, 192.709\(c\) \(192.613\(a\), 192.613\(b\), 192.703\(b\), 192.703\(c\)\)](#) (also References presented in: [MO.GO](#), [MO.GOCLASS](#))

Question Text *Do records indicate performance of continuing surveillance of facilities as required, and also the reconditioning, phasing out, or MAOP reduction in any pipeline segment that was determined to be in unsatisfactory condition but on which no immediate hazard existed?*

Assets Covered [86257](#)

Result Notes [J.R. Simplot](#) patrolled its transmission line in April and October of each year. Reviewed the following sample of pipeline patrol records (Form 3(a)):

[2021](#): Reviewed walking patrol record from 10/25/21 performed by Matthew Schmidt. No construction, erosion, or leak found during patrol.

[2022](#): Reviewed walking patrol record from 4/21/22 conducted by Matthew Schmidt. No construction, erosion, or leak found during patrol.

[2023](#): Reviewed walking patrol record from 4/13/23 performed by Matthew Schmidt. No construction, erosion, or leak found during patrol.

[2024](#): Reviewed walking patrol record from 10/03/24 performed by Matthew Schmidt. Construction activity documented and no erosion or leak found.

Reviewed the following leakage survey records (Form 3(b)):

[2021](#): Matthew Schmidt conducted leak survey of line on 4/20/21 using calibrated Sensit Trak-It (#4638). No gas detected.

[2022](#): Matthew Schmidt conducted leak survey of line on 3/23/22 using calibrated Sensit Trak-It III (#9419). No gas detected.

[2023](#): Matthew Schmidt conducted leak survey of line on 4/23/23 using calibrated Sensit Trak-It III (#9419). No gas detected.

[2024](#): Matthew Schmidt conducted leak survey of line on 4/17/24 using calibrated Sensit Trak-It (4638). No gas detected.

Reviewed OQs for Matthew Schmidt (EWN-714334). Qualification is current for Task 016G – Inspection of Surface (Right of Way) and Leak Survey of Gas Pipelines (1:0).

53. Question Result, ID, [NA, MO.GO.CONTSURVEILLANCE.O, 192.613\(a\) \(192.613\(b\), 192.703\(a\), 192.703\(b\), 192.703\(c\)\)](#) (also References presented in: [MO.GO](#), [MO.GOCLASS](#))

Question Text *Are unsatisfactory conditions being captured and addressed by continuing surveillance of facilities and the pipeline as required by 192.613?*

Assets Covered [86257](#)

Result Notes [No such event occurred, or condition existed, in the scope of inspection review. There were no unsatisfactory conditions captured during the 2021-2024 inspection cycle.](#)

54. Question Result, ID, [Sat, MO.RW.LEAKRECORDS.P](#), (also presented in: [MO.RW](#))

Question Text *Does the operator have procedures to prepare and maintain gas leak records containing all information required by WAC 480-93-178?*

Assets Covered [86257](#)

Result Notes [OM Manual, Section 7.12, Gas Leak Records WAC 480-93-187, Page 7-16.](#)

Except as required to be disclosed by law, any inspection documentation, including completed protocol forms, summary reports, executive summary reports, and enforcement documentation are for internal use only by federal or state pipeline safety regulators. Some inspection documentation may contain information which the operator considers to be confidential. In addition, supplemental inspection guidance and related documents in the file library are also for internal use only by federal or state pipeline safety regulators (with the exception of documents published in the federal register, such as advisory bulletins). Do not distribute or otherwise disclose such material outside of the

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