

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	9015_Klickitat PUD_Standard_2025	Operator(s)	KLICKITAT PUBLIC UTILITY DISTRICT (39809)	Plan Submitted	02/08/2025
Status	LOCKED	Lead	Jason Hoxit	Plan Approval	02/11/2025 by Dennis Ritter
Start Year	2025	Observer(s)	David Cullom, Anthony Dorrrough, Derek Norwood, Scott Anderson, John Trier, Marina Rathbun, Tom Green	All Activity Start	10/06/2025
System Type	GT	Director	Scott Rukke, Dennis Ritter	All Activity End	10/09/2025
Protocol Set ID	WA.GT.2024.02			Inspection Submitted	11/20/2025
				Inspection Approval	11/20/2025 by Dennis Ritter

Inspection Summary

Inspection Scope and Summary

This standard comprehensive inspection for Klickitat PUD's RNG system included field observations, reviewing procedures, and reviewing random selections of records pertaining to reporting, assessment and repair, design and construction, operations and maintenance, public awareness and damage prevention, training and qualification, and emergency response for 2022-2024. The previous standard inspection was conducted on May 10, 2022, which found four AOCs. Those AOCs pertained to emergency response training, NPMS submissions, annual report filings, and filing construction defects and materials failures report.

Facilities visited and Total AFOD

The records and procedures portion of the inspection was conducted remotely via Microsoft Teams. The field observation portion of the inspection was conducted at Klickitat PUD's RNG facility in Roosevelt, WA.
4 AFODs

Summary of Significant Findings

(DO NOT Discuss Enforcement options)

There were two violations as a result of the inspection:

CFR 192.614(c)(5) - Failing to provide temporary marking of buried pipelines in the area of excavation activity before the activity begins.

RCW 19.122.030(4)(a) - Failing to provide information to excavator before work-to-begin date on notice.

Primary Operator contacts and/or participants

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Scope (Assets)

#	Short Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1.	88970 (1,934)	Klickitat PUD	unit	88970	Compressor Stations Bottle/Pipe - Holders Vault Service Line Gas Storage Field (Aboveground) Offshore OCS GOM Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric Plastic Pipe AMAOP CDA Abandoned	364	364	364	364	100.0%

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

Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	88970 (1,934)	--	MO	P, R, O, S	Detail	--
2.	88970 (1,934)	2019 Gas Rule, Core, WUTC Standard Inspection	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, UNGS, 114, GENERIC	P, R, O, S	Detail	--

Plan Implementations

#	Activity Name	SMAR T Act#	Start Date	End Date	Focus Directives	Involved Groups/Subgroups	Asset s	Qst Type(s)	Planned	Require d	Inspecte d	Total	Require d % Complet e
1	Records and Procedures Review	--	10/06/2025	10/09/2025	--	all planned questions	all assets	P, S, R	306	306	306	306	100.0%
2	Field	--	10/06/2025	10/09/2025	--	all planned questions	all assets	O	58	58	58	58	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	Records and Procedures Review	COMPLETED	10/30/2025	Records and Procedures Review	88970 (1,934)

Results (all values, 364 results)

399 (instead of 364) results are listed due to re-presentation of questions in more than one sub-group.

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

1. 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 **88970 (1,934)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

AR.PTI: Integrity Assessment Via Pressure Test

2. 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 **88970 (1,934)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
3. 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 **88970 (1,934)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
4. 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 **88970 (1,934)**
Result Notes **No such activity/condition was observed during the inspection.**
5. 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 **88970 (1,934)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
6. 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 **88970 (1,934)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

AR.PFP: Predicted Failure Pressure

7. Question Result, ID, References **NA, 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 88970 (1,934)
- Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
8. Question Result, ID, NA, AR.PFP.ANOMALYDENTS.P, 192.605 (192.607, 192.712(a), 192.712(b), 192.933(d), 192.485, References 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 88970 (1,934)
- Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
9. Question Result, ID, NA, AR.PFP.ANOMALYCRACKMODEL.P, 192.605 (192.607, 192.712(a), 192.712(d)(1)) References
- 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 88970 (1,934)
- Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
10. Question Result, ID, NA, AR.PFP.ANOMALYCRACKGROWTH.P, 192.605 (192.607, 192.712(d)(2)) References
- 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 88970 (1,934)
- Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
11. Question Result, ID, NA, AR.PFP.ANOMALYCRACKSURVIVEPT.P, 192.712(d)(3) (192.607, 192.712(a), 192.712(d)(1)) References
- 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 88970 (1,934)
- Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
12. Question Result, ID, NA, AR.PFP.ANOMALYDATAUSE.P, 192.605 (192.607, 192.712(e)) References
- 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 88970 (1,934)
- Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
13. Question Result, ID, NA, AR.PFP.ANOMALYRECORDS.P, 192.605 (192.607, 192.712(g)) References
- 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 88970 (1,934)
- Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
14. Question Result, ID, NA, AR.PFP.ANOMALYREASSESS.P, 192.605 (192.712(h)) References
- Question Text *Do procedures detail the reassessment of anomalies when an operator used an Engineering Critical Assessment method?*
- Assets Covered 88970 (1,934)
- Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
15. Question Result, ID, NA, AR.PFP.ANOMALYRECORDS.R, 192.712(g) (192.712(e)) References
- 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 88970 (1,934)

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

AR.RCNONHCA: Repair Criteria (Non-HCA)

16. Question Result, ID, References Sat, AR.RCNONHCA.GENERAL.P, 192.605(a) (192.714(a), 192.714(b), 192.714(h))
Question Text *Do the repair procedures detail making repairs in a safe manner in non-covered segments?*
Assets Covered 88970 (1,934)
Result Notes KPUD OMM, Section 15.4 - Repair Criteria for Onshore Transmission Pipelines 192.714, Page 15-4.
17. 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 88970 (1,934)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
18. 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 88970 (1,934)
Result Notes KPUD OMM, Section 15.4 - Repair Criteria for Onshore Transmission Pipelines 192.714, Page 15-4.
19. 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 88970 (1,934)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
20. 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 88970 (1,934)
Result Notes KPUD OMM, Section 15.4 - Repair Criteria for Onshore Transmission Pipelines 192.714, Pages 15-4 and 15-5.
21. 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 88970 (1,934)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
22. 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 88970 (1,934)
Result Notes KPUD OMM, Section 15.4 - Repair Criteria for Onshore Transmission Pipelines 192.714, Pages 15-5 and 15-6.
23. 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 88970 (1,934)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

24. 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 **88970 (1,934)**
 Result Notes **KPUD OMM, Section 15.4 - Repair Criteria for Onshore Transmission Pipelines 192.714, Pages 15-6 and 15-7.**
25. 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 **88970 (1,934)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
26. 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 **88970 (1,934)**
 Result Notes **KPUD OMM, Section 15.4 - Repair Criteria for Onshore Transmission Pipelines 192.714, Pages 15-7 and 15-8.**
27. 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 **88970 (1,934)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
28. 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 **88970 (1,934)**
 Result Notes **KPUD OMM, Section 15.4 - Repair Criteria for Onshore Transmission Pipelines 192.714, Page 15-8.**
29. 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 **88970 (1,934)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
30. 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 **88970 (1,934)**
 Result Notes **KPUD OMM, Section 15.4 - Repair Criteria for Onshore Transmission Pipelines 192.714, Page 15-8.**
31. 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 **88970 (1,934)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
32. 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 **88970 (1,934)**
 Result Notes **No such activity/condition was observed during the inspection.**

AR.RMP: Repair Methods and Practices

33. 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 **88970 (1,934)**
Result Notes **No such activity/condition was observed during the inspection.**
34. 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 **88970 (1,934)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
35. 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 **88970 (1,934)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
36. Question Result, ID, References **NA, AR.RMP.REPLACESTD.R, 192.713(a) (Part 192 Subpart D)**
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 **88970 (1,934)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
37. 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 **88970 (1,934)**
Result Notes **No such activity/condition was observed during the inspection.**

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

38. Question Result, ID, References **NA, AR.PA.ASSESSCHED.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 **88970 (1,934)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
39. Question Result, ID, References **NA, AR.PA.ASSESSCHED.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 **88970 (1,934)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
40. Question Result, ID, References **NA, 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 **88970 (1,934)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
41. Question Result, ID, References **NA, 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 88970 (1,934)

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

42. Question Result, ID, References NA, 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 88970 (1,934)

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

43. Question Result, ID, References NA, 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 88970 (1,934)

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

44. Question Result, ID, References NA, 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 88970 (1,934)

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

45. 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 88970 (1,934)

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

46. Question Result, ID, References NA, 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 88970 (1,934)

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

47. 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 88970 (1,934)

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

48. Question Result, ID, References NA, 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 88970 (1,934)

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

49. Question Result, ID, References NA, 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 88970 (1,934)

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

50. Question Result, ID, References **NA, 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 **88970 (1,934)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
51. Question Result, ID, References **NA, AR.PA.RAMETHOD.R, 192.710**
 Question Text *Do records demonstrate that the operator has performed a risk assessment on the non-HCA pipeline segments?*
 Assets Covered **88970 (1,934)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
52. Question Result, ID, References **NA, 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 **88970 (1,934)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
53. Question Result, ID, References **NA, 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 **88970 (1,934)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

DC.CO: Construction

54. Question Result, ID, References **NA, DC.CO.CASING.R, 192.303 (192.323(a), 192.323(b), 192.323(c), 192.323(d), 192.467(a), 192.467(b))**
 Question Text *Do records indicate casings are installed in accordance with the requirements of WAC 480-93-115?*
 Assets Covered **88970 (1,934)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
55. Question Result, ID, References **NA, DC.CO.CASING.O, 192.323 (192.467(a), 192.467(b))**
 Question Text *Do field observations confirm railroad or highway casings are being installed as designed and specified, and in accordance with 192.323?*
 Assets Covered **88970 (1,934)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
56. Question Result, ID, References **NA, DC.CO.REPAIR.R, 192.303 (192.309, 192.493)**
 Question Text *Do records demonstrate that repairs to steel pipe are being made in accordance with §192.309?*
 Assets Covered **88970 (1,934)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

DC.WELDINSP: Construction Weld Inspection

57. Question Result, ID, References **NA, DC.WELDINSP.WELDVISUALQUAL.R, 192.241 (192.225, 192.227, 192.229, 192.231, 192.233, 192.243, 192.245)**
 Question Text *Does the operator have records showing that the welding was visually and/or non-destructively tested according to the requirements of 192.241 and the operator's specifications or procedures?*
 Assets Covered **88970 (1,934)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
58. Question Result, ID, References **NA, DC.WELDINSP.WELDNDR.R, 192.243**

Question Text *Do records indicate that NDT and interpretation are in accordance with 192.243?*

Assets Covered 88970 (1,934)

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

59. Question Result, ID, References NA, DC.WELDINSP.WELDREPAIR.R, 192.245 (192.303)

Question Text *Do records indicate that unacceptable welds are removed and/or repaired in accordance with 192.245?*

Assets Covered 88970 (1,934)

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

DC.WELDPROCEDURE: Construction Welding Procedures

60. Question Result, ID, References Sat, DC.WELDPROCEDURE.WELD.R, 192.225

Question Text *Does the operator have detailed records showing proper qualification of the welding procedures in accordance with 192.225?*

Assets Covered 88970 (1,934)

Result Notes KPUD OMM, Section 16.3 - Welding Procedure 192.225, Page 16-1. No welding has been performed on the pipeline since installation in 2018.

61. Question Result, ID, References NA, DC.WELDPROCEDURE.WELDERQUAL.R, 192.227 (192.225, 192.229)

Question Text *Do the records demonstrate that the welders are qualified in accordance with applicable sections of API Standard 1104 or ASME BPVC, Section IX, and cover the limitations in §192.229?*

Assets Covered 88970 (1,934)

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

62. Question Result, ID, References NA, DC.WELDPROCEDURE.WELDERQUAL.O, 192.227 (192.225, 192.229)

Question Text *Do field observations confirm that the welders are qualified in accordance with applicable sections of API Standard 1104 or ASME BPVC, Section IX, and cover the limitations in §192.229?*

Assets Covered 88970 (1,934)

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

DC.DPCOPP: Design of Pipe - Overpressure Protection

63. Question Result, ID, References NA, DC.DPCOPP.OVERPRESSURE.R, 192.195(a) (192.199(a), 192.199(b), 192.199(c), 192.199(d), 192.199(e), 192.199(f), 192.199(g), 192.199(h), 192.201(a), 192.201(b), 192.201(c))

Question Text *Do records indicate that the pipeline has pressure relieving or pressure limiting devices that are required by 192.195(a), and that they meet the requirements of 192.199 and 192.201?*

Assets Covered 88970 (1,934)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. There is no overpressure protection on the pipeline system.

64. Question Result, ID, References NA, DC.DPCOPP.OVERPRESSURE.O, 192.195(a) (192.199(a), 192.199(b), 192.199(c), 192.199(d), 192.199(e), 192.199(f), 192.199(g), 192.199(h), 192.201(a), 192.201(b), 192.201(c))

Question Text *Are required pressure relieving or pressure limiting devices being installed, and do they meet the requirements of 192.199 and 192.201?*

Assets Covered 88970 (1,934)

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

65. Question Result, ID, References NA, DC.DPCOPP.PRESSLIMIT.R, 192.199(a) (192.199(b), 192.199(c), 192.199(d), 192.199(e), 192.199(f), 192.199(g), 192.199(h))

Question Text *Do records indicate that pressure relieving or pressure limiting devices meet the requirements of 192.199?*

Assets Covered 88970 (1,934)

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

66. Question Result, ID, References NA, DC.DPCOPP.PRESSLIMIT.O, 192.199(a) (192.199(b), 192.199(c), 192.199(d), 192.199(e), 192.199(f), 192.199(g), 192.199(h))

Question Text *Do field observations confirm pressure relieving or pressure limiting devices meet the requirements of 192.199?*

Assets Covered 88970 (1,934)

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

67. Question Result, ID, References NA, DC.DPCOPP.PRESSLIMITCAP.R, 192.201(a) (192.201(b), 192.201(c))

Question Text *Do records indicate that pressure relief or pressure limiting stations being installed comply with 192.201?*

Assets Covered 88970 (1,934)

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

68. Question Result, ID, References NA, DC.DPCOPP.PRESSLIMITCAP.O, 192.201(a) (192.201(b), 192.201(c))

Question Text *Do field observations verify pressure relief or pressure limiting stations comply with the requirements of 192.201?*

Assets Covered 88970 (1,934)

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

69. Question Result, ID, References NA, DC.DPCOPP.MULTISTAGE.R,

Question Text *Do records indicate that the operator is installing multistage regulator equipment consistent with the requirements in WAC 480-93-130?*

Assets Covered 88970 (1,934)

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

DC.DPC: Design of Pipe Components

70. Question Result, ID, References Sat, DC.DPC.ILIPASS.R, 192.150 (192.150(a), 192.150(c), 192.493)

Question Text *Do records indicate that certain transmission pipeline components are designed and constructed to accommodate the passage of instrumented internal inspection devices?*

Assets Covered 88970 (1,934)

Result Notes KPUD's pipeline has ILI capability but no ILI has been performed since the installation of the pipeline. KPUD OMM, Section 15.30 - Passage of Internal Inspection Devices 192.150, Pages 15-22 and 15-23.

71. Question Result, ID, References Sat, DC.DPC.VALVESPACE.R, 192.179(a) (192.179(a)(1), 192.179(a)(2), 192.179(a)(3), 192.179(a)(4), 192.179(b), 192.179(c), 192.179(d))

Question Text *Do records indicate that transmission line valve spacing is in accordance with 192.179(a)?*

Assets Covered 88970 (1,934)

Result Notes The valves on Pipeline A and Pipeline B are located at Williams tie-in site and at KPUD plant. The distance between each valve is 2.79 miles in a Class 1 location.

72. Question Result, ID, References Sat, DC.DPC.VALVESPACE.O, 192.141 (192.179(a), 192.179(b), 192.179(c), 192.179(d))

Question Text *Are transmission line valves being installed as required by §192.179?*

Assets Covered 88970 (1,934)

Result Notes KPUD's pipeline is 2.78 miles in a Class 1 location, so each point on the pipeline is within 10 miles of a valve.

DC.CCROT: Corrosion Control and Cathodic Protection

73. Question Result, ID, References Sat, DC.CCROT.INTCORRODE.R, 192.476(d) (192.476(b), 192.476(c), 192.476(a))

Question Text *Do records demonstrate the transmission line project has features incorporated into its design and construction to reduce the risk of internal corrosion, as required of 192.476?*

Assets Covered 88970 (1,934)

Result Notes KPUD only transports dry gas. The gas is processed at KPUD plant with the use of compressors, heaters, dryers, coolers, and heat exchangers to remove water, H₂S, CO₂, O₂, and N₂ prior to injecting into the pipeline. KPUD produces pipeline gas that is over 98% pure CH₄. KPUD has gas chromatograph to monitor if there is corrosive gas.

74. Question Result, ID, References **NA, DC.CCPROT.INTCORRODE.O, 192.476(a) (192.476(b), 192.476(c))**
 Question Text *Does the transmission project's design and construction comply with 192.476?*
 Assets Covered **88970 (1,934)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
75. Question Result, ID, References **NA, DC.CCPROT.COATLOWER.R, 192.143(b) (192.461(c))** (also presented in: DC.CO)
 Question Text *Do records indicate that each pipe segment with external protective coating was inspected just prior to lowering into the ditch and backfilling, and any damage detrimental to effective corrosion control was repaired?*
 Assets Covered **88970 (1,934)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
76. Question Result, ID, References **NA, DC.CCPROT.COATINGASSESS.O, 192.461(c) (192.319(d))**
 Question Text *For an onshore steel gas transmission pipeline project 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 **88970 (1,934)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
77. Question Result, ID, References **NA, DC.CCPROT.COATBORING.R, 192.143(b) (192.461(e))**
 Question Text *Do records indicate that precautions were taken to minimize damage to the coating during installation, if coated pipe is installed by boring, driving, or other similar method?*
 Assets Covered **88970 (1,934)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
78. Question Result, ID, References **NA, DC.CCPROT.ELECTRICALISOL.R, 192.467(c) (192.143(b))**
 Question Text *Do operator's records indicate that each pipeline was electrically isolated from metallic casings that are a part of the underground system?*
 Assets Covered **88970 (1,934)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
79. Question Result, ID, References **NA, DC.CCPROT.ELECTRICALISOL.O, 192.467(c) (192.143(b))**
 Question Text *Do field observations confirm that each pipeline was electrically isolated from metallic casings that are a part of the underground system?*
 Assets Covered **88970 (1,934)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review. No casings.**

DC.MO: Maintenance and Operations

80. Question Result, ID, References **NA, DC.MO.ICEXAMINE.R, 192.491(c) (192.475(a), 192.475(b), 192.475(c))**
 Question Text *Do records indicate examination of removed pipe for evidence of internal corrosion?*
 Assets Covered **88970 (1,934)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
81. Question Result, ID, References **NA, DC.MO.ICEXAMINE.O, 192.475(a) (192.475(b), 192.475(c))**
 Question Text *Is examination of removed pipe conducted to determine any evidence of internal corrosion?*
 Assets Covered **88970 (1,934)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
82. Question Result, ID, References **NA, DC.MO.MAOPLIMIT.O, 192.605(b)(5)**
 Question Text *During startup or shut-in, is it assured that the pressure limitations on the pipeline were not exceeded?*
 Assets Covered **88970 (1,934)**

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

83. Question Result, ID, NA, DC.MO.RECORDUPDATE.R,
References

Question Text *Do records indicate that records, maps, and drawings of gas facilities are updated not later than six months from completion of construction activity and made available to appropriate personnel?*

Assets Covered 88970 (1,934)

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

DC.PT: Pressure Testing

84. Question Result, ID, NA, DC.PT.PRESSTEST.R, 192.503(a) (192.503(b), 192.503(c), 192.503(d), 192.503(e)) (also presented
References in: DC.PTLOWPRESS)

Question Text *Do records indicate that pressure testing is conducted in accordance with 192.503?*

Assets Covered 88970 (1,934)

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

85. Question Result, ID, NA, DC.PT.PRESSTEST.O, 192.503(a) (192.503(b), 192.503(c), 192.503(d), 192.503(e)) (also presented
References in: DC.PTLOWPRESS)

Question Text *Is pressure testing conducted in accordance with 192.503?*

Assets Covered 88970 (1,934)

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

86. Question Result, ID, NA, DC.PT.PRESSTESTHIGHSTRESS.R, 192.505(a) (192.143(a), 192.517(a), 192.505(b), 192.505(c),
References 192.505(d), 192.143(b), 192.143(c))

Question Text *Do records indicate that the sections of a pipeline operating at a hoop stress equal to or greater than 30% of SMYS were strength tested in accordance with the requirements of 192.505?*

Assets Covered 88970 (1,934)

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

87. Question Result, ID, NA, DC.PT.PRESSTESTHIGHSTRESS.O, 192.505(a) (192.143(a), 192.505(b), 192.505(c), 192.505(d),
References 192.143(b), 192.143(c))

Question Text *Do field observations confirm that sections of a pipeline operating at a hoop stress equal to or greater than 30% of SMYS are strength tested in accordance with the requirements of 192.505?*

Assets Covered 88970 (1,934)

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

88. Question Result, ID, Sat, DC.PT.PRESSTESTENVIRON.P, 192.515(b) (192.629(a), 192.629(b)) (also presented in: DC.SPT,
References DC.PTLOWPRESS)

Question Text *Does the process require that, as applicable to the project, while conducting tests under Subpart J – Test Requirements, the test medium will be disposed of in a manner that will minimize damage to the environment?*

Assets Covered 88970 (1,934)

Result Notes KPUD OMM, Section 17.2 - Personnel / Environmental Protection 192.515, Page 17-1.

89. Question Result, ID, NA, DC.PT.PRESSTESTENVIRON.R, 192.515(b) (192.629(a), 192.629(b), 192.603(b)) (also presented in:
References DC.SPT, DC.PTLOWPRESS)

Question Text *Do records indicate while conducting tests under Subpart J – Test Requirements, the test medium disposal was conducted in a manner that minimized damage to the environment?*

Assets Covered 88970 (1,934)

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

90. Question Result, ID, NA, DC.PT.PRESSTESTENVIRON.O, 192.515(b) (192.629(a), 192.629(b)) (also presented in: DC.SPT,
References DC.PTLOWPRESS)

Question Text *Do field observations confirm while conducting tests under Subpart J – Test Requirements, the test medium was disposed of in an environmentally sound manner?*

Assets Covered 88970 (1,934)

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

91. Question Result, ID, Sat, DC.PT.PRESSTESTSAFETY.P, 192.515(a) (192.629(a), 192.629(b)) (also presented in: DC.SPT,
References DC.PTLOWPRESS)

Question Text *Does the process require that, as applicable to the project, while conducting tests under Subpart J – Test Requirements, every reasonable precaution is taken to protect its employees and the general public throughout the testing?*

Assets Covered 88970 (1,934)

Result Notes KPUD OMM, Section 17.2 - Personnel / Environmental Protection 192.515, Page 17-1.

92. Question Result, ID, NA, DC.PT.PRESSTESTSAFETY.R, 192.515(a) (192.629(a), 192.629(b)) (also presented in: DC.SPT, References DC.PTLOWPRESS)

Question Text *Do records indicate while conducting tests under Subpart J – Test Requirements, every reasonable precaution was taken to protect its employees and the general public throughout the testing?*

Assets Covered 88970 (1,934)

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

93. Question Result, ID, NA, DC.PT.PRESSTESTSAFETY.O, 192.515(a) (192.629(a), 192.629(b)) (also presented in: DC.SPT, References DC.PTLOWPRESS)

Question Text *Do field observations confirm while conducting tests under Subpart J – Test Requirements, every reasonable precaution is taken to protect its employees and the general public throughout the testing?*

Assets Covered 88970 (1,934)

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

94. Question Result, ID, Sat, DC.PT.PRESSTESTRECORD.P, 192.517(a) (192.517(b)) (also presented in: DC.SPT, References DC.PTLOWPRESS)

Question Text *Does the process require that, as applicable to the project, creation and retention of a record of each Subpart J test for the required duration?*

Assets Covered 88970 (1,934)

Result Notes KPUD OMM, Section 17.7 - Pressure Test Recordkeeping Requirements 192.517, Page 17-4. KPUD OMM, Section 4.2 - Record Retention 192.605(b)(3), 192.709, Page 4-1.

95. Question Result, ID, NA, DC.PT.PRESSTESTRECORD.R, 192.517(a) (192.517(b)) (also presented in: DC.SPT, References DC.PTLOWPRESS)

Question Text *Do records indicate creation and retention of a record for each Subpart J test performed for the required duration?*

Assets Covered 88970 (1,934)

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

96. Question Result, ID, NA, DC.PT.EQUIPMENTCALIBRATION.R, References

Question Text *Do records indicate that pressure testing equipment is maintained and calibrated at appropriate intervals in accordance with the manufacturer's recommendations?*

Assets Covered 88970 (1,934)

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

DC.SPT: Spike Hydrotest

97. Question Result, ID, Sat, DC.SPT.SPIKEPRESSTEST.P, 192.605(b) (192.506) References

Question Text *Do the operator's procedures provide adequate instruction for conducting a Spike hydrotest, if applicable, according to the regulations?*

Assets Covered 88970 (1,934)

Result Notes KPUD OMM, Section 17.4 - Transmission Lines: Spike Hydrostatic Pressure 192.506, Page 17-3.

98. Question Result, ID, NA, DC.SPT.SPIKEPRESSTEST.R, 192.709 (192.506, 192.517) References

Question Text *Do records indicate that spike pressure testing is/was conducted in accordance with §192.506?*

Assets Covered 88970 (1,934)

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

99. Question Result, ID, NA, DC.SPT.SPIKEPRESSTEST.O, 192.506 (192.503) References

Question Text *Do field observations verify pressure testing is conducted in accordance with §192.506?*

Assets Covered 88970 (1,934)

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

DC.PTLOWPRESS: Pressure Testing - Low Pressure

100. Question Result, ID, NA, DC.PTLOWPRESS.PRESSTESTLOWSTRESS.R, 192.507 (192.505, 192.515, 192.517, ANSI/GPTC
References Z380.1-2018 Appendix G-192-9)
Question Text *Do records indicate that, as applicable to the project, sections of a pipeline operating at a hoop stress less than 30% of SMYS and at or above 100 psig were tested in accordance with the requirements of 192.507?*
Assets Covered 88970 (1,934)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
101. Question Result, ID, NA, DC.PTLOWPRESS.PRESSTESTLOWSTRESS.O, 192.507 (192.505, 192.515, ANSI/GPTC Z380.1-2018
References Appendix G-192-9)
Question Text *Do field observations confirm that sections of a pipeline operating at a hoop stress less than 30% of SMYS and at or above 100 psig are tested in accordance with the requirements of 192.507?*
Assets Covered 88970 (1,934)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
102. Question Result, ID, NA, DC.PTLOWPRESS.PRESSTEST100PSIG.R, 192.509 (192.143, 192.517)
References
Question Text *Do records indicate that the sections of a pipeline operated below 100 psig were leak tested in accordance with the section requirements of 192.509 (except for service lines and plastic pipelines)?*
Assets Covered 88970 (1,934)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
103. Question Result, ID, NA, DC.PTLOWPRESS.PRESSTEST100PSIG.O, 192.509 (192.143)
References
Question Text *Do field observations confirm that sections of a pipeline operated below 100 psig are leak tested in accordance with the requirements of 192.509 (except for service lines and plastic pipelines)?*
Assets Covered 88970 (1,934)
Result Notes No such activity/condition was observed during the inspection.

DC.TQ: Training and Qualification

104. Question Result, ID, Sat, DC.TQ.ABNORMAL.R, 192.807(a) (192.803)
References
Question Text *Do records show evaluation of qualified individuals for recognition and reaction to AOCs?*
Assets Covered 88970 (1,934)
Result Notes Reviewed OQ Report for all operator personnel. This information was exported from Energy WorldNet. All employees up to date.

Task ID 10351 - EWN-CBT-Abnormal Operating Conditions: Gas AOCs.
105. Question Result, ID, Sat, DC.TQ.OQCONTRACTOR.R, 192.807(a) (Operators OQ program manual)
References
Question Text *Are qualification records maintained for contractor personnel?*
Assets Covered 88970 (1,934)
Result Notes Contractor qualification records are maintained by Everline. Reviewed qualified personnel records and OQ Report.
106. Question Result, ID, Sat, DC.TQ.RECORDS.R, 192.807(a) (Operators OQ program manual)
References
Question Text *Are qualification records maintained for operator personnel?*
Assets Covered 88970 (1,934)
Result Notes Reviewed OQ Report for all operator personnel. This information was exported from Energy WorldNet. All employees up to date.
107. Question Result, ID, Sat, DC.TQ.EXCAVATE.R, 192.807(a) (ADB-2006-01)
References

Question Text *Do records demonstrate individuals who oversee marking, trenching and backfilling operations are qualified?*

Assets Covered 88970 (1,934)

Result Notes Everline Contractor Jonathan Lemon - EWN-493701:

Task ID 79621 - EWN-PE-Backfilling (0981) - Completed on 2/26/2024 and valid until 2/26/2027.

Task ID 80776 - EWN-Locate Underground Pipelines (1291) - Completed on 2/27/2024 and valid until 2/27/2027.

108. Question Result, ID, References Sat, DC.TQ.HOTTAP.R, 192.807(a) (192.627)

Question Text *Do records document the qualification of personnel performing hot taps?*

Assets Covered 88970 (1,934)

Result Notes No such event occurred, or condition existed, in the scope of inspection review. KPUD/Everline personnel would not perform hot taps. In the event that a contractor performed hot taps, they would be qualified under KPUD OQ Plan, Section 8 - Tapping a Pipeline, Task 36B, Page 8-17. KPUD OMM, Section 15.13 - Tapping Pipelines 192.627, .805(b), Page 15-14.

EP.ERG: Emergency Response

109. Question Result, ID, References Sat, EP.ERG.REVIEW.R, 192.605(a) (192.9(d), 192.9(e))

Question Text *Have annual reviews been conducted of the emergency plans and procedures as required, and any updates completed as appropriate?*

Assets Covered 88970 (1,934)

Result Notes Reviewed the ERP reviews and revisions for 2022-2024. The reviews/revisions were performed by Everline on 9/01/22, 10/30/23, 11/20/23, 11/18/24, and 1/18/25. Conducted annually and did not exceed 15 months. KPUD OMM/ERP, Section 20, Form 2 - O&M Manual Review / Revisions.

110. Question Result, ID, References Sat, EP.ERG.LOCATION.O, 192.615(b)(1) (192.9(d), 192.9(e))

Question Text *Are supervisors provided the applicable portions of the emergency plan and procedures?*

Assets Covered 88970 (1,934)

Result Notes KPUD OMM/ERP is available to Everline and KPUD personnel at the facility.

111. Question Result, ID, References NA, EP.ERG.NOTICES.R, 192.615(a)(1) (192.9(d), 192.9(e))

Question Text *Do records indicate receiving, identifying, classifying and communication of notices of events requiring immediate response in accordance with procedures?*

Assets Covered 88970 (1,934)

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

112. Question Result, ID, References NA, EP.ERG.NOTIFY911.R, 192.615(a) (192.615(a)(8), 192.9(d), 192.9(e), NTSB P-11-9)

Question Text *Do records indicate that immediate and direct notification was made to 911 emergency call centers (or local emergency responder agency) for the communities and jurisdictions in which pipelines were located for situations when an emergency or possible rupture of a pipeline was indicated?*

Assets Covered 88970 (1,934)

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

113. Question Result, ID, References NA, EP.ERG.POSTEVTREVIEW.R, 192.605(a) (192.615(b)(1), 192.615(b)(3), 192.9(d), 192.9(e))

Question Text *Do records indicate review of employee activities to determine whether the procedures were effectively followed in each emergency?*

Assets Covered 88970 (1,934)

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

114. Question Result, ID, References 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 88970 (1,934)

Result Notes Reviewed Form F-36 - Documenting First Responder Liaison Efforts for 2021. Reviewed 2021 emails sent to emergency responders with KPUD's public awareness plan attached. Reviewed public officials and emergency officials lists for 2022-2024. Reviewed Bickleton/Roosevelt FD site visit documentation for 2025. Reviewed local emergency officials list in KPUD's ERP, Section 19.14 - Local Emergency Officials, Page 19-13.

115. Question Result, ID, References NA, EP.ERG.VALVESHUTOFF.R, 192.605(b) (192.636(b))

Question Text *Do the records demonstrate RMVs or AETs were shut-off in accordance with §192.636(b) following identification of a release?*

Assets Covered 88970 (1,934)

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

116. Question Result, ID, References NA, EP.ERG.NOTIFPOTRUPTURE.R, 192.635

Question Text *Do the records indicate the operator properly identified and notified operator's personnel of a potential rupture?*

Assets Covered 88970 (1,934)

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

EP.FII: Failure & Incident Investigation

117. Question Result, ID, References NA, EP.FII.INCIDENTANALYSIS.R, 192.617(d)

Question Text *Do records indicate pipeline incidents were analyzed to determine their causes?*

Assets Covered 88970 (1,934)

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

118. Question Result, ID, References NA, EP.FII.FAILUREANALYSIS.R, 192.617(d)

Question Text *Do records indicate pipeline failures were analyzed to determine their causes?*

Assets Covered 88970 (1,934)

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

IM.CA: Continual Evaluation and Assessment

119. Question Result, ID, References NA, 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 88970 (1,934)

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

IM.PM: Preventive and Mitigative Measures

120. Question Result, ID, References NA, 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 88970 (1,934)

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

IM.QA: Quality Assurance

121. 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 88970 (1,934)

Result Notes KPUD OMM, Section 20, Form 25 - Management of Change.

KPUD OMM, Section 1.6 - Operating Personnel Review 192.605(b)(8)(c)(4), Page 1-4.

KPUD OMM, Section 9.2 - Establishing MAOP 192.619, Page 9-1.

KPUD OMM, Section 8.2 - Continuing Surveillance 192.613, Page 8-4.

KPUD OMM, Section 19.21 - Placing System Back into Service 192.605(b)(5), Page 19-25.

MO.GC: Conversion to Service

122. Question Result, ID, References Sat, MO.GC.CONVERSION.P, 192.14(a) (192.14(b), 192.14(c))

Question Text *If any pipelines were converted into Part 192 service, was a process developed addressing all the applicable requirements?*

Assets Covered 88970 (1,934)

Result Notes No pipelines were converted into Part 192 service; however, there is a procedure. KPUD OMM, Section 3.5 - Conversion to Service 192.14, Page 3-4.

123. Question Result, ID, References NA, MO.GC.CONVERSION.R, 192.14(a) (192.14(b), 192.14(c))

Question Text *Do records indicate the process was followed for converting any pipelines into Part 192 service?*

Assets Covered 88970 (1,934)

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

MO.GOABNORMAL: Gas Pipeline Abnormal Operations

124. Question Result, ID, References Sat, MO.GOABNORMAL.ABNORMAL.P, 192.605(a) (192.605(c)(1))

Question Text *Does the process fully address the responsibilities during and after an abnormal operation?*

Assets Covered 88970 (1,934)

Result Notes KPUD OMM, Section 13 - Abnormal Operations, Pages 13-1 through 13-6.

125. Question Result, ID, References NA, MO.GOABNORMAL.ABNORMAL.R, 192.605(a) (192.605(c)(1))

Question Text *Did personnel respond to indications of abnormal operations as required by the process?*

Assets Covered 88970 (1,934)

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

126. Question Result, ID, References Sat, MO.GOABNORMAL.ABNORMALCHECK.P, 192.605(a) (192.605(c)(2))

Question Text *Does the process include requirements for checking variations from normal operation after abnormal operation has ended at sufficient critical locations in the system to determine continued integrity and safe operation?*

Assets Covered 88970 (1,934)

Result Notes KPUD OMM, Section 13.10 - Checking Variations from Normal Operations 192.605(c)(2), Page 13-7.

127. Question Result, ID, References Sat, MO.GOABNORMAL.ABNORMALNOTIFY.P, 192.605(a) (192.605(c)(3))

Question Text *Does the process include requirements for notifying responsible operator personnel when notice of an abnormal operation is received?*

Assets Covered 88970 (1,934)

Result Notes KPUD OMM, Section 13.1 - Abnormal Operations, Page 13-1.

128. Question Result, ID, References Sat, MO.GOABNORMAL.ABNORMALREVIEW.P, 192.605(a) (192.605(c)(4))

Question Text *Does the process include requirements for periodically reviewing the response of operator personnel to determine the effectiveness of the processes controlling abnormal operation and taking corrective action where deficiencies are found?*

Assets Covered 88970 (1,934)

Result Notes KPUD OMM, Section 13.9 - Reviewing Abnormal Operation Response 192.605(c)(4), Page 13-6.

129. Question Result, ID, References NA, MO.GOABNORMAL.ABNORMALREVIEW.R, 192.605(a) (192.605(c)(4))

Question Text *Do records indicate periodic review of work done by operator personnel to determine the effectiveness of the abnormal operation processes and corrective action taken where deficiencies are found?*

Assets Covered 88970 (1,934)

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

MO.GOCLASS: Gas Pipeline Class Location

130. Question Result, ID, References Sat, MO.GOCLASS.CLASSLOCATESTUDY.P, 192.605(b)(1) (192.609(a), 192.609(b), 192.609(c), 192.609(d), 192.609(e), 192.609(f))

Question Text *Does the process include a requirement that the operator conduct a study whenever an increase in population density indicates a change in the class location of a pipeline segment operating at a hoop stress that is more than 40% SMYS, or indicates that the hoop stress corresponding to the established maximum allowable operating pressure for a segment of existing pipeline is not commensurate with the present class location?*

Assets Covered 88970 (1,934)

Result Notes KPUD OMM, Section 8.1 - Change in Class Location: Required Study 192.5, 192.609, .611, Page 8-1.

131. Question Result, ID, References Sat, MO.GOCLASS.CLASSLOCATESTUDY.R, 192.605(b)(1) (192.609(a), 192.609(b), 192.609(c), 192.609(d), 192.609(e), 192.609(f))

Question Text *Do records indicate performance of the required study whenever the population along a pipeline increased or there was an indication that the pipe hoop stress was not commensurate with the present class location?*

Assets Covered 88970 (1,934)

Result Notes There was not an increase in population or an indication that the pipe hoop stress was not commensurate with the present class location. Everline conducted Class Location Study, HCA & MCA Analysis on 8/15/23, 2/26/24, 5/15/24, and 5/26/24.

132. Question Result, ID, References Sat, MO.GOCLASS.CLASSLOCATEREV.P, 192.605(b)(1) (192.609, 192.611(a), 192.611(b), 192.611(c), 192.611(d))

Question Text *Does the process include a requirement that the MAOP of a pipeline segment be confirmed or revised within 24 months whenever the hoop stress corresponding to the established MAOP is determined not to be commensurate with the existing class location?*

Assets Covered 88970 (1,934)

Result Notes KPUD OMM, Section 8.2 - Change in Class Location: Confirmation / Revision of MAOP 192.609, .611, Page 8-3

133. Question Result, ID, References NA, MO.GOCLASS.CLASSLOCATEREV.R, 192.605(b)(1) (192.609, 192.611(a), 192.611(b), 192.611(c), 192.611(d))

Question Text *Was the MAOP in a pipeline segment confirmed or revised within 24 months as required?*

Assets Covered 88970 (1,934)

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

134. Question Result, ID, References Sat, MO.GOCLASS.CLASSLOCATEREV.O, 192.611(a) (192.609)

Question Text *Do field observations verify that current population density and operator-determined class locations are consistent?*

Assets Covered 88970 (1,934)

Result Notes Walked the entire pipeline with Jonathan Lemon of Everline on 10/07/25 while he was performing continuing surveillance. Field observations verify that population density and operator-determined Class 1 location are accurate.

MO.GOMAOP: Gas Pipeline MAOP

135. Question Result, ID, [Sat, MO.GOMAOP.MAOPDETERMINE.P, 192.605\(b\)\(1\) \(192.619\(a\), 192.619\(b\), 192.619\(c\), 192.619\(f\), 192.8\(b\), 192.8\(c\)\(4\), 192.9\(d\), 192.9\(e\)\(2\), 192.9\(f\)\(1\)\)](#)
 Question Text *Does the process include requirements for determining the maximum allowable operating pressure for a pipeline segment in accordance with §192.619?*
 Assets Covered [88970 \(1,934\)](#)
 Result Notes [KPUD OMM, Section 9.2 - Establishing MAOP 192.619, Pages 9-1 through 9-13.](#)
136. Question Result, ID, [Sat, MO.GOMAOP.MAOPLIMIT.P, 192.605\(a\) \(192.605\(b\)\(5\), 192.8\(b\), 192.8\(c\)\(4\), 192.9\(d\), 192.9\(e\)\(2\), 192.9\(f\)\(1\)\)](#)
 Question Text *Does the process include requirements for starting up and shutting down any part of the pipeline in a manner to assure operation with the MAOP limits, plus the build-up allowed for operation of pressure-limiting and control devices?*
 Assets Covered [88970 \(1,934\)](#)
 Result Notes [KPUD OMM, Section 3.2 - Start-Up New Pipeline Procedures 192.605\(b\)\(5\), Page 3-2. KPUD OMM, Section 3.3 - Shutdown Procedures, Page 3-2.](#)
137. Question Result, ID, [Sat, MO.GOMAOP.MAOPDETERMINE.R, 192.709\(c\) \(192.619\(a\), 192.619\(b\), 192.619\(c\), 192.619\(f\), 192.517, 192.8\(b\), 192.8\(c\)\(4\), 192.9\(d\), 192.9\(e\)\(2\), 192.9\(f\)\(1\)\)](#)
 Question Text *Do records indicate determination of the MAOP of pipeline segments in accordance with 192.619 and limiting of the operating pressure as required?*
 Assets Covered [88970 \(1,934\)](#)
 Result Notes [Reviewed 2017 RNG Pipeline - WUTC Calculations conducted by McMillen Jacobs Associates. Reviewed McMillen Jacobs Associates/Rockford Corporation hydrostatic test documents from 2018. Reviewed KPUD OMM, Section 3.1 - Pipeline System\(s\) Description, Page 3-1. KPUD operates its pipeline at an MAOP of 900 psig.](#)
138. Question Result, ID, [NA, MO.GOMAOP.MAOPLIMIT.R, 192.603\(b\) \(192.605\(b\)\(5\), 192.619\(a\), 192.8\(b\), 192.8\(c\)\(4\), 192.9\(d\), 192.9\(e\)\(2\), 192.9\(f\)\(1\)\)](#)
 Question Text *Do records indicate operation within MAOP limits, plus the build-up allowed for operation of pressure-limiting and control devices, was assured while starting up and shutting down any part of the pipeline?*
 Assets Covered [88970 \(1,934\)](#)
 Result Notes [No such event occurred, or condition existed, in the scope of inspection review.](#)

MO.GM: Gas Pipeline Maintenance

139. Question Result, ID, [Sat, MO.GM.RECORDS.P, 192.605\(b\)\(1\) \(192.709\(a\), 192.709\(b\), 192.709\(c\)\)](#) (also presented in: [References MO.GMOPP](#))
 Question Text *Does the process include a requirement that the operator maintain a record of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test?*
 Assets Covered [88970 \(1,934\)](#)
 Result Notes [KPUD OMM, Section 4.2 - Record Retention 192.605\(b\)\(3\), 192.709, Page 4-1.](#)
140. Question Result, ID, [Sat, MO.GM.RECORDS.R, 192.605\(b\)\(1\) \(192.243\(f\), 192.709\(a\), 192.709\(b\), 192.709\(c\)\)](#) (also presented in: [References MO.GMOPP](#))
 Question Text *Do records indicate that records are maintained of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test?*
 Assets Covered [88970 \(1,934\)](#)
 Result Notes [Reviewed Form F-17 - Pipeline Patrol Report, Form 3\(a\) - Pipeline Patrol, and Form 3\(b\) - Leakage Survey for 2022-2024. No repairs have been performed on the pipeline since it was installed in 2018.](#)
141. Question Result, ID, [Sat, MO.GM.IGNITION.P, 192.605\(b\)\(1\) \(192.751\(a\), 192.751\(b\), 192.751\(c\)\)](#)
 Question Text *Are there processes for minimizing the danger of accidental ignition where gas constitutes a hazard of fire or explosion?*
 Assets Covered [88970 \(1,934\)](#)
 Result Notes [KPUD OMM, Section 12.1 - Accidental Ignition Prevention 192.751, Page 12-1.](#)
142. Question Result, ID, [NA, MO.GM.IGNITION.R, 192.709 \(192.751\(a\), 192.751\(b\), 192.751\(c\)\)](#)
 Question Text *Do records indicate personnel followed processes for minimizing the danger of accidental ignition where the presence of gas constituted a hazard of fire or explosion?*
 Assets Covered [88970 \(1,934\)](#)

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

143. Question Result, ID, References NA, MO.GM.IGNITION.O, 192.751(a) (192.751(b), 192.751(c))

Question Text *Are the operator's precautionary measures adequate on a gas transmission line where there exists the potential for accidental ignition?*

Assets Covered 88970 (1,934)

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

144. Question Result, ID, References Sat, MO.GM.VALVEINSPECT.P, 192.605(b)(1) (192.745(a), 192.745(b))

Question Text *Are there processes for inspecting and partially operating each transmission line valve that might be required in an emergency at intervals not exceeding 15 months, but at least once each calendar year and for taking prompt remedial action to correct any valve found inoperable?*

Assets Covered 88970 (1,934)

Result Notes KPUD OMM, Section 11.1 - Valve Inspections: Transmission Lines 192.745, Page 11-1.

145. Question Result, ID, References Sat, MO.GM.VALVEINSPECT.R, 192.709(c) (192.745(a), 192.745(b))

Question Text *Do records indicate proper inspection and partial operation of transmission line valves that may be required during an emergency as required and prompt remedial actions taken if necessary?*

Assets Covered 88970 (1,934)

Result Notes Reviewed Form F-4 - Valve Inspection completed on 6/30/2022 by Roy Rogers from Cathodic Protection Engineering.

Reviewed Form 9 - Valve Inspection Form completed on 5/10/2023 by Eric Larson from Everline.

Reviewed Form 9 - Valve Inspection Form completed on 5/15/2024 by Eric Larson.

All valves were inspected and operated within the required time interval. No valve was found inoperable.

146. Question Result, ID, References Sat, MO.GM.VALVEINSPECT.O, 192.745(a) (192.745(b))

Question Text *Are field inspection and partial operation of transmission line valves adequate?*

Assets Covered 88970 (1,934)

Result Notes Jonathan Lemon performed partial operation on valves HA-14548 and HA-14554 at gate station, and valves HA-14545 and HA-14551 at KPUD RNG plant. Valve operation was adequate.

Jonathan Lemon's OQ (EWN-493701):

Task ID: 0301 - Open and Close Valves Manually (1:3) - Expires on 1/12/2026

Task ID: 0331- Perform Valve Visual Inspection and Partial Operation (1:2) - Expires on 2/26/2027

147. Question Result, ID, References Sat, MO.GM.TRAPSAFETY.P, 192.750 (192.605(b), 192.801, 192.805) (also presented in: DC.DPCOPP)

Question Text *Do the procedures require all launchers and receivers to have adequate safety devices in accordance with 192.750 and to ensure the safety devices are working properly just prior to each use?*

Assets Covered 88970 (1,934)

Result Notes KPUD OMM, Section 9.15 - Launcher & Receiver Safety 192.750, Page 9-15.

148. Question Result, ID, References NA, MO.GM.TRAPSAFETY.R, 192.750 (192.605(b), 192.801, 192.805) (also presented in: DC.DPCOPP)

Question Text *Does the operator have records to demonstrate whether all launchers and receivers have safety devices that were utilized prior to each use?*

Assets Covered 88970 (1,934)

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

149. Question Result, ID, References NA, MO.GM.TRAPSAFETY.O, 192.750 (192.605(b), 192.801, 192.805) (also presented in: DC.DPCOPP)

Question Text *Do field observations confirm selected launchers and receivers have safety devices installed and whether the safety devices were inspected prior to each use?*

Assets Covered 88970 (1,934)

Result Notes No such event occurred, or condition existed, in the scope of inspection review. KPUD has not ran an ILI tool in either pipeline since installation in 2018. There are safety devices installed at both the Williams gate station and KPUD plant sides that are capable of safely relieving pressure in the barrel.

150. Question Result, ID, References Sat, MO.GM.AETREQUIREMENT.P, 192.605(b) (192.745(d))

Question Text *Do the procedures specify the requirements necessary to be achieved when operator installs an AET?*

Assets Covered 88970 (1,934)

Result Notes KPUD OMM, Section 11.1 - Valve Inspections: Transmission Lines 192.745, Pages 11-1 and 11-2.

151. Question Result, ID, References NA, MO.GM.AETREQUIREMENT.R, 192.709(c) (192.709(b), 192.745(d))

Question Text *Do the records demonstrate that the operator complied with the requirements for AET response drills?*

Assets Covered 88970 (1,934)

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

152. Question Result, ID, References Sat, MO.GM.RMVREMEDIAL.P, 192.605(b) (192.179, 192.745(e))

Question Text *Do the procedures adequately describe the remedial measures required for RMVs or AETs found inoperable or unable to maintain shut-off?*

Assets Covered 88970 (1,934)

Result Notes KPUD OMM, Section 11.1 - Valve Inspections: Transmission Lines 192.745, Page 11-2.

153. Question Result, ID, References NA, MO.GM.RMVREMEDIAL.R, 192.709(b) (192.179, 192.745(e))

Question Text *Do the records demonstrate the remedial measure requirements for RMVs or AETs were met?*

Assets Covered 88970 (1,934)

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

154. Question Result, ID, References Sat, MO.GM.ASVSHUTINPRESS.P, 192.605(b) (192.636(f), 192.745(f))

Question Text *Do the procedures adequately describe the process for confirming ASV shut-in pressures?*

Assets Covered 88970 (1,934)

Result Notes KPUD OMM, Section 11.1 - Valve Inspections: Transmission Lines 192.745, Page 11-2.

155. Question Result, ID, References NA, MO.GM.ASVSHUTINPRESS.R, 192.709(b) (192.636(f), 192.745(f))

Question Text *Do the records demonstrate the process for confirming ASV shut-in pressures?*

Assets Covered 88970 (1,934)

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

MO.GOODOR: Gas Pipeline Odorization

156. Question Result, ID, References Sat, MO.GOODOR.ODORIZE.P, 192.605(b)(1) (192.625(a), 192.625(b), 192.625(c), 192.625(d), 192.625(e), 192.625(f))

Question Text *Does the process ensure appropriate odorant levels are contained in its combustible gases in accordance with 192.625?*

Assets Covered 88970 (1,934)

Result Notes KPUD OMM, Section 7.10 - Odorization of Gas 192.625, WAC 480-93-015, Page 7-11.

157. Question Result, ID, References Sat, MO.GOODOR.ODORIZE.R, 192.709(c) (192.625(a), 192.625(b), 192.625(c), 192.625(d), 192.625(e), 192.625(f))

Question Text *Do records indicate appropriate odorization of its combustible gases in accordance with its processes and conduct of the required testing to verify odorant levels met requirements?*

Assets Covered 88970 (1,934)

Result Notes Reviewed sample of monthly odorant tests from 2022-2024.

2022: Reviewed odorant tests on Form F-22 - Heath Odorator Measurements that were conducted on 3/28/22 and 6/30/22 by Roy Rogers of Cathodic Protection Engineering. Reviewed Form 19 - Odorization Report for an odorant test conducted on 12/08/22 by Eric Larson of Everline.

2023: Reviewed odorant tests on Form 19 - Odorization Report that were conducted on 2/13/23, 5/10/23, 8/15/23, and 11/06/23 by Eric Larson.

2024: Reviewed odorant tests on Form 19 - Odorization Report that were conducted on 1/09/24, 7/10/24, and 10/09/24 by Eric Larson and Jonathan Lemon of Everline.

158. Question Result, ID, References **Sat, MO.GOODOR.ODORIZE.O, 192.625(f)**
- Question Text *Is sampling of combustible gases adequate using an instrument capable of determining the percentage of gas in air at which it becomes readily detectable?*
- Assets Covered **88970 (1,934)**
- Result Notes **No odorant is added to gas that is delivered from KPUD to Williams. Odorant test site location is at KPUD plant for pipeline that receives gas from Williams.**
- Calibration: Odorator (S/N: 2000650003) - Due 5/07/26**
- Instrument Threshold Reading: 0.89% gas in air. Instrument Readily Detectable Reading: 0.92% gas in air. Gas is readily detectable at least 1/5 LEL.**
- Jonathan Lemon's OQ (EWN-493701): Task ID: 1211 - Perform Periodic Sampling of Odorization (1:1) – Expires on 1/12/2026**

MO.GO: Gas Pipeline Operations

159. 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.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 **88970 (1,934)**
- Result Notes **KPUD OMM, Section 8.3 - Continuing Surveillance 192.613, Pages 8-4 and 8-5.**
160. 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.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 **88970 (1,934)**
- Result Notes **KPUD did not recondition, phase out, or reduce the MAOP in any pipeline segment that was determined to be in unsatisfactory condition but on which no immediate hazard existed.**
- Reviewed walking patrol records for 2022-2024. KPUD used Form F-17 - Pipeline Patrol Report during 2022 and used Form 3(a) - Pipeline Patrol during 2023-2024. No AOCs, no new structures, no erosion, no construction activity, and no SRCs were observed during patrols.**
- Reviewed Form 3(b) - Leakage Survey records for 2022-2024. No leaks were detected on Pipeline A or B in any leak survey.**
161. Question Result, ID, References **Sat, MO.GO.CONTSURVEILLANCE.O, 192.613(a) (192.613(b), 192.703(a), 192.703(b), 192.703(c))** (also 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 **88970 (1,934)**
- Result Notes **Walked the entire pipeline with Jonathan Lemon of Everline on 10/07/25 while he was performing pipeline patrol and leak survey. No unsatisfactory conditions were observed.**
- Jonathan Lemon's OQ (EWN-493701):**

Task ID: 1311 - Inspect Pipeline Surface Conditions by Patrolling Right-of-Way or Easement (1:1) - Expires on 1/13/2026

Task ID: 1261 - Perform Walking Gas Leakage Survey (1:1) - Expires on 1/13/2026

Task ID: 0141 - Perform Visual Inspection for Atmospheric Corrosion (1:1) - Expires on 1/19/2027

162. Question Result, ID, References **Sat, MO.GO.CONTSURVINSPECTION.P, 192.605 (192.613(c)(1))**
Question Text *Do operator's procedures detail performing initial inspections of pipeline facilities after an extreme weather event or natural disaster?*
Assets Covered **88970 (1,934)**
Result Notes **KPUD OMM, Section 8.3 - Continuing Surveillance 192.613, Pages 8-4 and 8-5.**
163. Question Result, ID, References **NA, MO.GO.CONTSURVINSPECTION.R, 192.603(b) (192.613(c)(1))**
Question Text *Do the records show that operator assessed the nature of an event after an extreme weather event or natural disaster, including initial inspections?*
Assets Covered **88970 (1,934)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
164. Question Result, ID, References **Sat, MO.GO.CONTSURVTIMING.P, 192.605 (192.613(c)(2))**
Question Text *Are operator's procedures for performing inspections of pipeline facilities after an extreme weather event or natural disaster, including appropriate response times and PHMSA notification complete?*
Assets Covered **88970 (1,934)**
Result Notes **KPUD OMM, Section 8.3 - Continuing Surveillance 192.613, Page 8-5.**
165. Question Result, ID, References **NA, MO.GO.CONTSURVTIMING.R, 192.605 (192.613(c)(2))**
Question Text *Do records show that operator performed an inspection of pipeline facilities after an extreme weather event or natural disaster, or notification of delayed response to appropriate PHMSA Regional Director within 72 hours ?*
Assets Covered **88970 (1,934)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
166. Question Result, ID, References **Sat, MO.GO.CONTSURVASSESS.P, 192.605 (192.613(c)(3))**
Question Text *Do the operator's procedures detail performing prompt and appropriate remedial actions of pipeline facilities after an extreme weather event or natural disaster?*
Assets Covered **88970 (1,934)**
Result Notes **KPUD OMM, Section 8.3 - Continuing Surveillance 192.613, Page 8-5.**
167. Question Result, ID, References **NA, MO.GO.CONTSURVASSESS.R, 192.603(b) (192.613(c)(3))**
Question Text *Do records show that operator performed prompt and appropriate remedial response after an extreme weather event or natural disaster?*
Assets Covered **88970 (1,934)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
168. Question Result, ID, References **NA, MO.GO.CONTSURV.O, 192.613(c)**
Question Text *Are the pipeline facilities that were affected by an extreme weather or natural disaster event back to a safe operating condition?*
Assets Covered **88970 (1,934)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
169. Question Result, ID, References **Sat, MO.GO.PURGE.P, 192.605(b)(1) (192.629(a), 192.629(b))**
Question Text *Does the process include requirements for purging of pipelines in accordance with 192.629?*
Assets Covered **88970 (1,934)**
Result Notes **KPUD OMM, Section 15.7 - Purging Pipelines 192.629, Page 15-10.**

170. Question Result, ID, References **Sat, MO.GO.OMANNUALREVIEW.P, 192.605(a)**
 Question Text *Does the process include a requirement to review the manual at intervals not exceeding 15 months, but at least once each calendar year?*
 Assets Covered **88970 (1,934)**
 Result Notes **KPUD OMM, Section 2.1 - Manual Review 192.605, Page 2-1.**
171. Question Result, ID, References **Sat, MO.GO.OMANNUALREVIEW.R, 192.605(a)**
 Question Text *Has the operator conducted annual reviews of the written procedures or processes in the manual as required?*
 Assets Covered **88970 (1,934)**
 Result Notes **KPUD OMM, Section 20, Form 2 - O&M Manual Review / Revisions. Annual reviews/revisions completed 9/1/22, 10/30/23, 11/20/23, 11/18/24, and 1/18/25.**
172. Question Result, ID, References **Sat, MO.GO.OMEFFECTREVIEW.P, 192.605(a) (192.605(b)(8))**
 Question Text *Does the process include requirements for periodically reviewing the work done by operator personnel to determine the effectiveness, and adequacy of the processes used in normal operations and maintenance and modifying the processes when deficiencies are found?*
 Assets Covered **88970 (1,934)**
 Result Notes **KPUD OMM, Section 1.6 - Operating Personnel Review 192.605(b)(8)(c)(4), Page 1-4. Also documented on Form 24 - Periodic Review of O&M Procedures, found in Section 20 of KPUD OMM.**
173. Question Result, ID, References **Sat, MO.GO.OMEFFECTREVIEW.R, 192.605(a) (192.605(b)(8))**
 Question Text *Do records indicate periodic review of the work done by operator personnel to determine the effectiveness, and adequacy of the processes used in normal operations and maintenance and modifying the processes when deficiencies are found?*
 Assets Covered **88970 (1,934)**
 Result Notes **Reviewed Form 26 - Periodic Review of O&M Procedures for 2022-2024. Reviews were completed by Everline personnel on 10/28/22, 12/27/23, and 12/03/24. The processes were determined to be satisfactory and no deficiencies were found on each review.**

Reviewed OQ Report for all operator personnel that was exported from EWN.
174. Question Result, ID, References **Sat, MO.GO.OMHISTORY.P, 192.605(a) (192.605(b)(3))**
 Question Text *Does the process include requirements for making construction records, maps and operating history available to appropriate operating personnel?*
 Assets Covered **88970 (1,934)**
 Result Notes **KPUD OMM, Section 4.2 - Record Retention 192.605(b)(3), 192.709, Page 4-1.**
175. Question Result, ID, References **Sat, MO.GO.OMHISTORY.R, 192.605(a) (192.605(b)(3))**
 Question Text *Are construction records, maps, and operating history available to appropriate operating personnel?*
 Assets Covered **88970 (1,934)**
 Result Notes **Everline accesses records, maps, and operating history through its compliance tracking software (SP3). KPUD personnel also have access but only in view mode only (no edit permissions).**
176. Question Result, ID, References **Sat, MO.GO.OMHISTORY.O, 192.605(b)(3)**
 Question Text *Are construction records, maps and operating history available to appropriate operating personnel?*
 Assets Covered **88970 (1,934)**
 Result Notes **Construction records, maps, and operating history are available to appropriate operating personnel both electronically and physically at KPUD's plant facility. The physical records are kept in a secure area.**
177. Question Result, ID, References **Sat, MO.GO.OMLOCATION.O, 192.605(a)**
 Question Text *Are appropriate parts of the manual kept at locations where operations and maintenance activities are conducted?*
 Assets Covered **88970 (1,934)**
 Result Notes **Manuals are available to operating personnel both electronically and physically at KPUD's plant facility.**

178. Question Result, ID, References **Sat, MO.GO.ODDOR.P, 192.605(a) (192.605(b)(11))**
 Question Text *Does the process require prompt response to the report of a gas odor inside or near a building?*
 Assets Covered **88970 (1,934)**
 Result Notes **KPUD OMM, Section 19.1 - General 192.605(e), Page 19-1.**
179. Question Result, ID, References **Sat, MO.GO.UPRATE.P, 192.13(c) (192.553(a), 192.553(b), 192.553(c), 192.553(d))**
 Question Text *Is the pressure uprating process consistent with the requirements of 192.553?*
 Assets Covered **88970 (1,934)**
 Result Notes **KPUD OMM, Section 9.12 - Uprating MAOP 192.553, .55, .557, Page 9-12.**
180. Question Result, ID, References **NA, MO.GO.UPRATE.R, 192.553(b) (192.553(a), 192.553(c), 192.553(d))**
 Question Text *Do records indicate the pressure uprating process was implemented per the requirements of 192.553?*
 Assets Covered **88970 (1,934)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
181. Question Result, ID, References **Sat, MO.GO.CLASSCHNGVALVSPACE.P, 192.605(b) (192.610)**
 Question Text *Does the process include the installation of RMVs or AETs whenever pipe replacements occur due to a class location change?*
 Assets Covered **88970 (1,934)**
 Result Notes **KPUD OMM, Section 8.4 - Change in Class Location: Change in Valve Spacing 192.610, Page 8-6.**
182. Question Result, ID, References **NA, MO.GO.CLASSCHNGVALVSPACE.R, 192.709(c) (192.610)**
 Question Text *Do records indicate the installation of RMVs or AETs occurred whenever pipe replacements occurred due to a class location change?*
 Assets Covered **88970 (1,934)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
183. Question Result, ID, References **NA, MO.GO.CLASSCHNGVALVSPACE.O, 192.709(c) (192.610)**
 Question Text *Do field observations verify RMVs or AETs were installed whenever pipe replacements occurred due to a class location change?*
 Assets Covered **88970 (1,934)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
184. Question Result, ID, References **Sat, MO.GO.MOC.P, 192.13(d) (192.909(a), 192.909(b))**
 Question Text *Is the procedure for management of changes that may impact pipeline safety adequate?*
 Assets Covered **88970 (1,934)**
 Result Notes **KPUD OMM, Section 20, Form 25 - Management of Change.**

KPUD OMM, Section 1.6 - Operating Personnel Review 192.605(b)(8)(c)(4), Page 1-4.

KPUD OMM, Section 9.2 - Establishing MAOP 192.619, Page 9-1.

KPUD OMM, Section 8.2 - Continuing Surveillance 192.613, Page 8-4.

KPUD OMM, Section 19.21 - Placing System Back into Service 192.605(b)(5), Page 19-25.
185. Question Result, ID, References **NA, MO.GO.MOC.R, 192.13**
 Question Text *Do records demonstrate that changes that may impact pipeline integrity are being managed as required?*
 Assets Covered **88970 (1,934)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

MO.GMOPP: Gas Pipeline Overpressure Protection

186. Question Result, ID, References **Sat, MO.GMOPP.PRESSREGCAP.P, 192.605(b)(1) (192.743(a), 192.743(b), 192.743(c))**
 Question Text *Does the process include procedures for ensuring that the capacity of each pressure relief device at pressure limiting stations and pressure regulating stations is sufficient?*
 Assets Covered **88970 (1,934)**
 Result Notes **KPUD OMM, Section 9.9 - Pressure Safety Device Capacity Reviews 192.743, Page 9-10.**
187. Question Result, ID, References **NA, MO.GMOPP.PRESSREGCAP.R, 192.709(c) (192.743(a), 192.743(b), 192.743(c))**
 Question Text *Do records indicate testing or review of the capacity of each pressure relief device at each pressure limiting station and pressure regulating station as required?*
 Assets Covered **88970 (1,934)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
188. Question Result, ID, References **Sat, MO.GMOPP.PRESSREGTEST.P, 192.605(b)(1) (192.739(a), 192.739(b))**
 Question Text *Does the process include procedures for inspecting and testing each pressure limiting station, relief device, and pressure regulating station and their equipment?*
 Assets Covered **88970 (1,934)**
 Result Notes **KPUD OMM, Section 9.8 - Pressure Limiting Device Inspection 192.739, .741, Page 9-9.**
189. Question Result, ID, References **NA, MO.GMOPP.PRESSREGTEST.R, 192.709(c) (192.739(a), 192.739(b))**
 Question Text *Do records indicate inspection and testing of pressure limiting, relief devices, and pressure regulating stations?*
 Assets Covered **88970 (1,934)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
190. Question Result, ID, References **NA, MO.GMOPP.PRESSREGTEST.O, 192.739(a) (192.739(b), 192.743)**
 Question Text *Are field or bench tests or inspections of regulating stations, pressure limiting stations or relief devices adequate?*
 Assets Covered **88970 (1,934)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

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

191. Question Result, ID, References **Sat, MO.RW.PATROL.P, 192.705(a) (192.705(b), 192.705(c))**
 Question Text *Does the process adequately cover the requirements for patrolling the ROW and conditions reported?*
 Assets Covered **88970 (1,934)**
 Result Notes **KPUD OMM, Section 7.1 - Pipeline Patrol: Transmission Lines 192.705, Page 7-1.**
192. Question Result, ID, References **Sat, MO.RW.PATROL.R, 192.709(c) (192.705(a), 192.705(b), 192.705(c))**
 Question Text *Do records indicate that ROW surface conditions have been patrolled as required?*
 Assets Covered **88970 (1,934)**
 Result Notes **Reviewed walking patrol records for 2022-2024. KPUD used Form F-17 - Pipeline Patrol Report in 2022 and used Form 3(a) - Pipeline Patrol in 2023-2024. Roy Rogers with Cathodic Protection Engineering conducted the patrol in 2022. Eric Larson with Everline conducted patrols during 2023-2024. No AOCs, no new structures, no erosion, no construction activity, and no SRCs were observed during patrols.**
- Reviewed F-17 - Pipeline Patrol Report and Form 3(b) - Leakage Survey records for 2022-2024. Roy Rogers conducted leak surveys in 2022 using calibrated Heath DP III. Eric Larson conducted leak surveys in 2022-2024 using calibrated Heath DP-IR and calibrated Heath RMLD. Jonathan Lemon with Everline conducted leak surveys in 2024 using calibrated Heath RMLD. No leaks were detected on Pipeline A or B in any leak survey.**
193. Question Result, ID, References **Sat, MO.RW.ROWMARKER.O, 192.707(a) (192.707(b), 192.707(c), 192.707(d), 192.9(d), 192.9(e))**

Question Text *Are line markers placed and maintained as required?*

Assets Covered 88970 (1,934)

Result Notes Walked the entire pipeline with Jonathan Lemon of Everline on 10/07/25 while he was performing continuing surveillance. Markers are placed and maintained in accordance with CFR 192.707 and WAC 480-93-124. Called the phone number provided on the markers and it went to KPUD's plant.

194. Question Result, ID, References Sat, MO.RW.ROWCONDITION.O, 192.705(a) (192.705(c))

Question Text *Are the ROW conditions acceptable for the type of patrolling used?*

Assets Covered 88970 (1,934)

Result Notes Walked the entire pipeline with Jonathan Lemon of Everline on 10/07/25 while he was performing continuing surveillance. Walking patrols are adequate for the ROW conditions.

195. Question Result, ID, References Sat, MO.RW.ROWMARKER.P, 192.707(a) (192.707(b), 192.707(c), 192.707(d))

Question Text *Does the process adequately cover the requirements for placement of ROW markers?*

Assets Covered 88970 (1,934)

Result Notes KPUD OMM, Section 18.2 - Pipeline Markers 192.707, WAC 480-93-124, Pages 18-3 and 18-4.

196. Question Result, ID, References Sat, MO.RW.MARKERSURVEY.P,

Question Text *Are procedures in place to survey pipeline markers at specified intervals?*

Assets Covered 88970 (1,934)

Result Notes KPUD OMM, Section 18.2 - Pipeline Markers 192.707, WAC 480-93-124, Page 18-4.

197. Question Result, ID, References Sat, MO.RW.MARKERSURVEY.R,

Question Text *Do records indicate that pipeline marker surveys were completed in the timeframe specified by WAC 480-93-124?*

Assets Covered 88970 (1,934)

Result Notes Reviewed walking patrol records for 2022-2024 (Form F-17 - Pipeline Patrol Report in 2022 and Form 3(a) - Pipeline Patrol in 2023-2024). Eric Larson of Everline completed a pipeline marker survey on 5/10/23. No issues found with markers.

198. Question Result, ID, References Sat, MO.RW.LEAKAGE.P, 192.706 (192.706(a), 192.706(b), 192.935(d))

Question Text *Does the process require leakage surveys to be conducted?*

Assets Covered 88970 (1,934)

Result Notes KPUD OMM, Section 7.4 - Leakage Survey: Transmission Pipelines 192.706; WAC 480-93-188, Page 7-4.

199. Question Result, ID, References Sat, MO.RW.LEAKAGE.R, 192.709(c) (192.706, 192.706(a), 192.706(b), 192.935(d), 192.703(c))

Question Text *Do records indicate leakage surveys conducted as required?*

Assets Covered 88970 (1,934)

Result Notes Reviewed sample of monthly leak surveys looking at Form F-17 - Pipeline Patrol Report and Form 3(b) - Leakage Survey records for 2022-2024. Roy Rogers conducted leak surveys in 2022 using calibrated Heath DP III. Eric Larson conducted leak surveys in 2022-2024 using calibrated Heath DP-IR and calibrated Heath RMLD. Jonathan Lemon conducted leak surveys in 2024 using calibrated Heath RMLD. No leaks were detected in any leak survey.

200. Question Result, ID, References Sat, MO.RW.LEAKAGE.O, 192.706 (192.706(a), 192.706(b), 192.703(c))

Question Text *Are leakage surveys being implemented as required?*

Assets Covered 88970 (1,934)

Result Notes Walked the entire pipeline with Jonathan Lemon of Everline on 10/07/25 while he was performing the leak survey.

Heath RMLD-IS (S/N: 8212208009) passed calibration on 10/07/25. No gas detected during leak survey.

Jonathan Lemon's OQ (EWN-493701):

Task ID: 1261 - Perform Walking Gas Leakage Survey (1:1) - Expires on 1/13/2026

201. Question Result, ID, References **Sat, MO.RW.CASINGLEAKSURVEY.P,**
 Question Text *Does the process require shorted casings be leak surveyed as required?*
 Assets Covered **88970 (1,934)**
 Result Notes **KPUD OMM, Section 10.16 - Electrical Isolation 192.467, Page 10-18.**
202. Question Result, ID, References **NA, MO.RW.CASINGLEAKSURVEY.R,**
 Question Text *Do records indicate shorted casings were leak surveyed as required?*
 Assets Covered **88970 (1,934)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
203. Question Result, ID, References **Sat, MO.RW.SPECIALLEAKSURVEY.P,**
 Question Text *Is there a process to conduct special leak surveys as required by WAC 480-93-188?*
 Assets Covered **88970 (1,934)**
 Result Notes **KPUD OMM, Section 7.6 - Leak Survey WAC 480-93-188, Page 7-5.**
204. Question Result, ID, References **NA, MO.RW.SPECIALLEAKSURVEY.R,**
 Question Text *Do records indicate that special leak surveys have been conducted as required by WAC 480-93-188?*
 Assets Covered **88970 (1,934)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
205. Question Result, ID, References **NA, MO.RW.LEAKAGE30SMYS.P, 192.935(d) (192.935(b)(1)(i), 192.935(b)(1)(iii))**
 Question Text *For pipelines operating below 30% SMYS in a Class 3 or 4 locations, but not in an HCA, is there a process for performing leak surveys?*
 Assets Covered **88970 (1,934)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
206. Question Result, ID, References **NA, MO.RW.LEAKAGE30SMYS.R, 192.935(d) (192.935(b)(1)(i), 192.935(b)(1)(iii))**
 Question Text *For pipelines operating below 30% SMYS in a Class 3 or 4 locations, but not in an HCA, do records indicate performance of leak surveys?*
 Assets Covered **88970 (1,934)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
207. Question Result, ID, References **Sat, MO.RW.LEAKGRADE.P,**
 Question Text *Do procedures require grading/re-grading leaks and evaluating the concentration and extent of leakage?*
 Assets Covered **88970 (1,934)**
 Result Notes **KPUD OMM, Section 7.8 - Leak Classification WAC 480-93-18601, Pages 7-8 through 7-10.**
208. Question Result, ID, References **NA, MO.RW.LEAKGRADE.R,**
 Question Text *Do records indicate that the operator has graded leaks and determined the extent of each leak?*
 Assets Covered **88970 (1,934)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
209. Question Result, ID, References **Sat, MO.RW.LEAKPERIMETER.P,**
 Question Text *Do procedures require checking the perimeter of a gas leak with a combustible gas indicator?*
 Assets Covered **88970 (1,934)**
 Result Notes **KPUD OMM, Section 7.13 - Determining Leak Spread, Page 7-15.**
210. Question Result, ID, References **Sat, MO.RW.LEAKFOLLOWUP.P,**
 Question Text *Do procedures require performing a follow-up inspection on all leak repairs with residual gas remaining in the ground not later than thirty days after the repair?*
 Assets Covered **88970 (1,934)**

Result Notes KPUD OMM, Section 7.8 - Leak Classification WAC 480-93-18601, Page 7-8.

211. Question Result, ID, References NA, MO.RW.LEAKFOLLOWUP.R,
Question Text *Do records indicate that a follow-up inspection was performed not more than thirty days following a repair where residual gas remained in the ground?*
Assets Covered 88970 (1,934)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
212. Question Result, ID, References NA, MO.RW.DOWNGRADELEAKREPAIR.R,
Question Text *Do records indicate that leaks that have been downgraded are repaired within twenty-one months?*
Assets Covered 88970 (1,934)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
213. Question Result, ID, References NA, MO.RW.LEAKREPAIRTIME.R,
Question Text *Do records indicate that leaks were repaired and re-evaluated within the timeframes specified in WAC 480-93-18601?*
Assets Covered 88970 (1,934)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
214. 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 88970 (1,934)
Result Notes KPUD OMM, Section 7.12 - Gas Leak Records WAC 480-93-187, Page 7-14.
215. Question Result, ID, References NA, MO.RW.LEAKRECORDS.R,
Question Text *Have gas leak records been prepared and maintained as required?*
Assets Covered 88970 (1,934)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
216. Question Result, ID, References Sat, MO.RW.LEAKCALIBRATE.P,
Question Text *Is there a process to maintain and calibrate gas detection instruments in accordance with the manufacturer's recommendations?*
Assets Covered 88970 (1,934)
Result Notes KPUD OMM, Section 7.4 - Leakage Survey: Transmission Pipelines 192.706; WAC 480-93-188, Page 7-4.
217. Question Result, ID, References Sat, MO.RW.LEAKCALIBRATE.R,
Question Text *Do records indicate that gas detection equipment has been maintained and calibrated in accordance with the manufacturer's recommendations?*
Assets Covered 88970 (1,934)
Result Notes KPUD used Heath DP III and DP-IR in 2022 and Heath RMLD in 2023-2024. The equipment is maintained and calibrated in accordance with the manufacturer's recommendations.

MO.MCA: Moderate Consequence Areas (MCA)

218. 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 88970 (1,934)
Result Notes KPUD OMM, Section 1.7 - Definitions 192.3, Page 1-6.
219. 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 88970 (1,934)

Result Notes KPUD Class Location Study, HCA & MCA Analysis, Moderate Consequence Area (MCA) Methodology, Page 10.

220. 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 88970 (1,934)

Result Notes KPUD Class Location Study, HCA & MCA Analysis, Moderate Consequence Area (MCA) Methodology, Pages 10 through B3.

221. Question Result, ID, References NA, 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 88970 (1,934)

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

222. Question Result, ID, References NA, 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 88970 (1,934)

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

223. 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 88970 (1,934)

Result Notes KPUD OMM, Section 1.7 - Definitions, Page 1-7.

224. Question Result, ID, References NA, 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 88970 (1,934)

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

225. 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 88970 (1,934)

Result Notes KPUD OMM, Section 8.1 - Change in Class Location: Required Study 192.5, 192.609, .611, Page 8-2.

226. Question Result, ID, References NA, 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 88970 (1,934)

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

227. 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 88970 (1,934)

Result Notes KPUD OMM, Section 9.3 - Reconfirmation of MAOP 192.624, Page 9-5.

228. 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 88970 (1,934)

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

MO.RECONFMATV: Verification of Materials Properties

229. Question Result, ID, References Sat, MO.RECONFMATV.PROGRAM.P, 192.607 (192.613, 192.619, 192.624, 192.632, 192.712)
Question Text *What is the process (or program) for determining and collecting material verification records for line pipe to meet the requirements of §§ 192.619(a)(4), 192.624, 192.607, and 192.712?*
Assets Covered 88970 (1,934)
Result Notes KPUD OMM, Section 4.13 - Verification of Pipeline Material & Attributes 192.607, Pages 4-9 through 4-11.
230. Question Result, ID, References Sat, MO.RECONFMATV.PROGRAM.R, 192.607(b)
Question Text *Does the line pipe material verification documentation (records) of material properties and attributes demonstrate compliance with §192.607(b)?*
Assets Covered 88970 (1,934)
Result Notes Reviewed KPUD Mill Data Sheet. No construction/repairs since pipeline was installed in 2018.
231. Question Result, ID, References Sat, MO.RECONFMATV.COMPONENTS.P, 192.607(f) (192.607, 192.624, 192.712)
Question Text *Does the process (or program) include determining which mainline pipeline components other than line pipe are subject to the verification of material properties and attributes requirements of 192.607(f)?*
Assets Covered 88970 (1,934)
Result Notes KPUD OMM, Section 4.13, Verification of Pipeline Material & Attributes 192.607, Page 4-11.
232. Question Result, ID, References Sat, MO.RECONFMATV.COMPONENTS.R, 192.607(f)
Question Text *Does the verification documentation (records) of material properties and attributes for mainline pipeline components other than line pipe demonstrate compliance with §192.607(f)?*
Assets Covered 88970 (1,934)
Result Notes Reviewed KPUD Mill Data Sheet. No construction/repairs since pipeline was installed in 2018.
233. Question Result, ID, References Sat, MO.RECONFMATV.OPPORTUNISTIC.P, 192.607(c) (192.607, 192.624, 192.632, 192.712)
Question Text *Do the procedures define when an open excavation requires material verification and when it does not? (i.e., what meets the criteria of an opportunistic dig?)*
Assets Covered 88970 (1,934)
Result Notes KPUD OMM, Section 4.13 - Verification of Pipeline Material & Attributes 192.607, Page 4-9.
234. Question Result, ID, References NA, MO.RECONFMATV.OPPORTUNISTIC.O, 192.607(c) (192.607, 192.624, 192.632, 192.712)
Question Text *Do field observations indicate that the opportunistic digs and testing conducted in the field meet the requirements of the procedures?*
Assets Covered 88970 (1,934)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
235. Question Result, ID, References Sat, MO.RECONFMATV.TESTMETHODS.P, 192.607(c) (192.607(d), 192.624, 192.712)
Question Text *What type(s) of NDT or destructive testing methods (i.e., ILI, in situ testing, etc.) is/are included in the procedures?*
Assets Covered 88970 (1,934)
Result Notes KPUD OMM, Section 4.13 - Verification of Pipeline Material & Attributes 192.607, Page 4-9.
236. Question Result, ID, References Sat, MO.RECONFMATV.TESTMETHODS.R, 192.607(b)
Question Text *Do the records indicate the type(s) of NDT or destructive testing methods used to comply with the procedures?*
Assets Covered 88970 (1,934)

Result Notes Reviewed McMillen Jacobs Associates/Rockford Corporation hydrostatic test documents from 2018. No construction/repairs since.

237. Question Result, ID, References Sat, MO.RECONFMATV.POPULGROUPS.P, 192.607(e) (192.624, 192.607, 192.712)
Question Text *If the operator plans to establish population groups, does the method employed meet the requirements of 192.607(e)?*
Assets Covered 88970 (1,934)
Result Notes KPUD OMM, Section 4.13 - Verification of Pipeline Material & Attributes 192.607, Page 4-10.
238. Question Result, ID, References NA, MO.RECONFMATV.POPULGROUPS.R, 192.607(e)
Question Text *Where the operator has established population groups, do the records support operator's approved methods and comply with 192.607(e)?*
Assets Covered 88970 (1,934)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

MO.RECONF: MAOP Reconfirmation

239. Question Result, ID, References Sat, MO.RECONF.MAOPMETHODORIG.R, 192.619 (192.624(a))
Question Text *Do records demonstrate what method(s) from §192.619 were used to determine the pipeline original MAOP on a segment-by-segment basis?*
Assets Covered 88970 (1,934)
Result Notes Reviewed 2017 RNG Pipeline - WUTC Calculations conducted by McMillen Jacobs Associates. Reviewed McMillen Jacobs Associates/Rockford Corporation hydrostatic test documents from 2018. Reviewed KPUD OMM, Section 3.1 - Pipeline System(s) Description, Page 3-1. KPUD operates its pipeline with an MAOP of 900 psig based on test pressure.
240. Question Result, ID, References NA, MO.RECONF.RECONFIRMAPPLIC.P, 192.624(a) (192.619(f))
Question Text *Do procedures indicate the pipeline segments for which MAOP reconfirmation is applicable and must be conducted as required by §192.624(a)?*
Assets Covered 88970 (1,934)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
241. Question Result, ID, References NA, MO.RECONF.RECONFIRMTIMING.P, 192.624(b) (192.18)
Question Text *Have the procedures been developed and implemented for pipeline segments determined to require MAOP reconfirmation, including timeline and complete dates, as required by §192.624(b)?*
Assets Covered 88970 (1,934)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
242. Question Result, ID, References NA, MO.RECONF.RECONFIRMTIMING.R, 192.624(b) (192.614(a))
Question Text *Do the records indicate that the operator is making adequate progress towards their implementation timeline / schedule as required by §192.624(b)?*
Assets Covered 88970 (1,934)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
243. Question Result, ID, References NA, MO.RECONF.RECONFIRMMETHODS.P, 192.624(c) (192.18, 192 Subpart J, 192.619(a)(2), 192.632)
Question Text *Are the procedures for conducting MAOP reconfirmation adequate for the methods used (or intended to be used) as required by §192.624(c)?*
Assets Covered 88970 (1,934)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
244. Question Result, ID, References NA, MO.RECONF.COMPONENTS.P, 192.624 (192.607(e), 192.607(f), 192.619)
Question Text *Do the MAOP reconfirmation methods for the applicable portions of the facilities (i.e., Compressor Stations, Meter & Regulating Stations) ensure that material properties are available to support the MAOP?*
Assets Covered 88970 (1,934)

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

245. Question Result, ID, References NA, MO.RECONF.COMPONENTS.R, 192.624 (192.607(e), 192.607(f), 192.619)

Question Text *Do the records identify all non-line pipe components requiring MAOP reconfirmation (e.g., compressor and meter stations)?*

Assets Covered 88970 (1,934)

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

246. Question Result, ID, References NA, MO.RECONF.RECONFIRMRECORDS.P, 192.624(b) (192.624(d), 192.619(f))

Question Text *Do the MAOP reconfirmation procedures require recordkeeping in accordance with §192.624(d) for the life of the pipeline?*

Assets Covered 88970 (1,934)

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

247. Question Result, ID, References NA, MO.RECONF.RECONFIRMRECORDS.R, 192.624(d) (192.517, 192.624(b), 192.619(f))

Question Text *Do the MAOP reconfirmation records meet the requirements of §192.624(d) and are they retained for the life of the pipeline?*

Assets Covered 88970 (1,934)

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

248. Question Result, ID, References NA, MO.RECONF.RECONFIRMATION.O, 192.624(c) (192.505, 192.506, 192.607)

Question Text *Do field observations of selected MAOP reconfirmation method(s) or related activities verify that the method employed conforms with the operator-established procedures?*

Assets Covered 88970 (1,934)

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

MO.RECONFM1: MAOP Reconfirmation - Method 1

249. Question Result, ID, References NA, MO.RECONFM1.METHOD1.P, 192.624(c)(1) (192.18, 192 Subpart J, 192.619(c))

Question Text *Where the operator has elected Method 1 for the MAOP reconfirmation, do the procedures for conducting a pressure test for MAOP reconfirmation meet the requirements of §192.624(c)(1)?*

Assets Covered 88970 (1,934)

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

250. Question Result, ID, References NA, MO.RECONFM1.METHOD1.R, 192.624(d) (192.624(c)(1), 192 Subpart J, 192.619(c))

Question Text *Where the operator has elected Method 1 for the MAOP reconfirmation, are the records adequate for a pressure test for MAOP reconfirmation as required by §192.624(c)(1)?*

Assets Covered 88970 (1,934)

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

MO.RECONFM2: MAOP Reconfirmation - Method 2

251. Question Result, ID, References NA, MO.RECONFM2.METHOD2.P, 192.624(c)(2) (192.18, 192 Subpart J, 192.619(c))

Question Text *Where the operator has elected Method 2 for the MAOP reconfirmation, do the procedures for conducting a pressure reduction for MAOP reconfirmation meet the requirements of §192.624(c)(2)?*

Assets Covered 88970 (1,934)

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

252. Question Result, ID, References NA, MO.RECONFM2.METHOD2.R, 192.624(d) (192.624(c)(2), 192 Subpart J, 192.18, 192.619(c))

Question Text *Where the operator has elected Method 2 for the MAOP reconfirmation, do the records confirm the pressure reduction for MAOP reconfirmation meet the requirements of §192.624(c)(2)?*

Assets Covered 88970 (1,934)

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

MO.RECONFM3: MAOP Reconfirmation - Method 3 (ECA)

253. Question Result, ID, References **NA, MO.RECONFM3.ECAASSESSMENT.P, 192.632**
Question Text *When the operator elects to use ECA for MAOP reconfirmation (per §192.624(c)(3)), do the procedures provide sufficient detail to ensure the ECA Assessment is conducted in accordance with §192.632?*
Assets Covered **88970 (1,934)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
254. Question Result, ID, References **NA, MO.RECONFM3.ECAANALYSIS1.P, 192.632(a) (192.624(c), 192.712)**
Question Text *When the operator elects to use ECA for MAOP reconfirmation (per §192.624(c)(3)), do the procedures provide sufficient detail to ensure the ECA Analysis is conducted in accordance with §192.632(a) for methods and data collection?*
Assets Covered **88970 (1,934)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
255. Question Result, ID, References **NA, MO.RECONFM3.ECAANALYSIS2.P, 192.632(a) (192.624(c), 192.712)**
Question Text *When the operator elects to use ECA for MAOP reconfirmation (per §192.624(c)(3)), do the procedures provide sufficient detail to ensure the ECA Analysis is conducted in accordance with §192.632(a) for crack analysis and predicted failure pressure (including Charpy V-notch)?*
Assets Covered **88970 (1,934)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
256. Question Result, ID, References **NA, MO.RECONFM3.ECAREMAINDEFECTS.P, 192.632(b) (192.624(c), 192.712)**
Question Text *When the operator elects to use ECA for MAOP reconfirmation (per §192.624(c)(3)), do the procedures provide sufficient detail to ensure the ECA Assessment is conducted in accordance with §192.632(b) for determining remaining defects?*
Assets Covered **88970 (1,934)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
257. Question Result, ID, References **NA, MO.RECONFM3.ECAREMAINDEFECTSILI.P, 192.632(c) (192.624(c), 192.712)**
Question Text *When the operator elects to use ECA for MAOP reconfirmation (per §192.624(c)(3)), do the procedures provide sufficient detail to ensure the ECA Analysis is conducted in accordance with §192.632(c) for selecting appropriate ILI tools?*
Assets Covered **88970 (1,934)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
258. Question Result, ID, References **NA, MO.RECONFM3.ECAREMAINPIPELINELIFE.P, 192.632(d) (192.624(c), 192.712)**
Question Text *When the operator elects to use ECA for MAOP reconfirmation (per §192.624(c)(3)), do the procedures provide sufficient detail to ensure the ECA Analysis is performed in accordance with §192.632(d) for estimating remaining life of the pipeline?*
Assets Covered **88970 (1,934)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
259. Question Result, ID, References **NA, MO.RECONFM3.ECAASSESSMENT.R, 192.632**
Question Text *When the operator elects to use ECA for MAOP reconfirmation (per §192.624(c)(3)), do the records indicate the ECA Analysis was conducted in accordance with their procedures and §192.632?*
Assets Covered **88970 (1,934)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
260. Question Result, ID, References **NA, MO.RECONFM3.ECAANALYSIS1.R, 192.632(a) (192.624(c), 192.712)**
Question Text *When the operator elects to use ECA for MAOP reconfirmation (per §192.624(c)(3)), do the records indicate the ECA Analysis was conducted in accordance with §192.632(a) for methods and data collection?*
Assets Covered **88970 (1,934)**

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

261. Question Result, ID, References NA, MO.RECONFM3.ECAANALYSIS2.R, 192.632(a) (192.624(c), 192.712)

Question Text *When the operator elects to use ECA for MAOP reconfirmation (per §192.624(c)(3)), do the records indicate the ECA Analysis was conducted in accordance with §192.632(a) for crack analysis and predicted failure pressure (including Charpy V-notch)?*

Assets Covered 88970 (1,934)

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

262. Question Result, ID, References NA, MO.RECONFM3.ECAREMAINDEFECTS.R, 192.632(b) (192.624(c), 192.712)

Question Text *When the operator elects to use ECA for MAOP reconfirmation (per §192.624(c)(3)), do the records indicate the ECA Assessment was conducted in accordance with §192.632(b) for determining remaining defects?*

Assets Covered 88970 (1,934)

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

263. Question Result, ID, References NA, MO.RECONFM3.ECAREMAINDEFECTSILI.R, 192.632(c) (192.624(c), 192.712)

Question Text *When the operator elects to use ECA for MAOP reconfirmation (per §192.624(c)(3)), do the records indicate the ECA Analysis was conducted in accordance with §192.632(c) for selecting appropriate ILI tools?*

Assets Covered 88970 (1,934)

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

264. Question Result, ID, References NA, MO.RECONFM3.ECAREMAINPIPELINELIFE.R, 192.632(d) (192.624(c), 192.712)

Question Text *When the operator elects to use ECA for MAOP reconfirmation (per §192.624(c)(3)), do the records indicate the ECA Analysis was performed in accordance with §192.632(d) for estimating remaining life of the pipeline?*

Assets Covered 88970 (1,934)

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

MO.RECONFM5: MAOP Reconfirmation - Method 5

265. Question Result, ID, References NA, MO.RECONFM5.METHOD5.P, 192.624(c)(5) (192.18, 192 Subpart J, 192.619(c))

Question Text *Where the operator has elected Method 5 for the MAOP reconfirmation, do the procedures for conducting a pressure reduction for pipeline segments with small PIR meet the requirements of §192.624(c)(5)?*

Assets Covered 88970 (1,934)

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

266. Question Result, ID, References NA, MO.RECONFM5.METHOD5.R, 192.624(d) (192.624(c)(5), 192.18, 192 Subpart J, 192.619(c))

Question Text *Where the operator has elected Method 5 for the MAOP reconfirmation, are the records for pressure reduction on pipeline segments with a small PIR for MAOP reconfirmation adequate as required by §192.624(c)(5)?*

Assets Covered 88970 (1,934)

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

MO.RECONFM6: MAOP Reconfirmation - Method 6

267. Question Result, ID, References NA, MO.RECONFM6.METHOD6.P, 192.624(c)(6) (192.18, 192 Subpart J, 192.619(c))

Question Text *Where the operator has elected Method 6 for the MAOP reconfirmation, do the procedures for the alternative technical evaluation process meet the requirements of §192.624(c)(6)?*

Assets Covered 88970 (1,934)

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

268. Question Result, ID, References NA, MO.RECONFM6.METHOD6.R, 192.624(d) (192.624(c)(6), 192.18, 192.619(c))

Question Text *Where the operator has elected Method 6 for the MAOP reconfirmation, do the records for the alternative technical evaluation process meet the requirements of §192.624(c)(6)?*

Assets Covered 88970 (1,934)

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

PD.DP: Damage Prevention

269. Question Result, ID, References **Unsat**, 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 88970 (1,934)

Result Issue Summary The operator did not have records for four locate tickets (22100071, 23031524, 24001939, 24166199) that were found on ITIC website during 2022-2024 for which KPUD was a notified member. The results in ITIC for KPUD on these tickets show "Does not report."

The operator failed to respond to four locate tickets (24284440, 24284441, 24284442, 24284443) in 2024.

192.614(c)(5) requires operators to provide temporary marking of buried pipelines in the area of excavation activity before, as far as practical, the activity begins.

RCW 19.122.030(4)(a) requires operators to provide information to an excavator no later than the work-to-begin date on the notice, unless otherwise agreed by written agreement between the facility operator and excavator.

Standard Issues B1 (Moderate or small impact/widespread occurrence) : 192.614(c)(5) : No record/documentation.
B1 (Moderate or small impact/widespread occurrence) : 192.614(c)(5) : Documentation does not demonstrate adequate implementation of operator's process.
B1 (Moderate or small impact/widespread occurrence) : 192.614(c)(5) : Records indicate requirement not completed at required intervals.

Result Notes Searched One Call Concepts ITIC website (ITIC) for locate tickets during 2022-2024 and found tickets 22100071 (2022), 23031524 (2023), 24001939 (2024), and 24166199 (2024) that KPUD was a notified member of but did not have records of. The status for all these tickets on ITIC shows "Does not report," and the proposed excavation sites were in the vicinity of KPUD's pipeline.

Reviewed KPUD's ITIC records for 2024 locate tickets: 24284440, 24284441, 24284442, and 24284443. The operator failed to respond to all four tickets, and the status on ITIC shows "Not yet responded."

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

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

Assets Covered 88970 (1,934)

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

271. 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 88970 (1,934)

Result Notes KPUD OMM, Section 18 - Damage Prevention, Pages 18-1 through 18-11. KPUD PAP.

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

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

Assets Covered 88970 (1,934)

Result Notes Reviewed walking patrol records for 2022-2024. KPUD used Form F-17 - Pipeline Patrol Report in 2022 and used Form 3(a) - Pipeline Patrol in 2023-2024. Roy Rogers with Cathodic Protection Engineering conducted the patrol in 2022. Eric Larson with Everline conducted patrols during 2023-2024. No AOCs, no new structures, no erosion, no construction activity, and no SRCs were observed during patrols.

Reviewed F-17 - Pipeline Patrol Report and Form 3(b) - Leakage Survey records for 2022-2024. Roy Rogers conducted leak surveys in 2022 using calibrated Heath DP III. Eric Larson conducted leak surveys

in 2022-2024 using calibrated Heath DP-IR and calibrated Heath RMLD. Jonathan Lemon with Everline conducted leak surveys in 2024 using calibrated Heath RMLD. No leaks were detected on Pipeline A or B in any leak survey.

273. 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 **88970 (1,934)**

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

274. 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 **88970 (1,934)**

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

275. 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 **88970 (1,934)**

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

PD.PA: Public Awareness

276. 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 **88970 (1,934)**

Result Notes **Reviewed affected public mailers for 2022-2024 that were delivered in Spanish.**

PD.SP: Special Permits

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

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

Assets Covered **88970 (1,934)**

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

RPT.NR: Notices and Reporting

278. Question Result, ID, References **Sat, RPT.NR.CONTACTUPDATE.R,**

Question Text *Do records indicate that the operator submits updated name, address, and phone numbers of emergency contacts/responsible officials to the commission and appropriate officials of ALL municipalities in which the company has pipeline facilities?*

Assets Covered **88970 (1,934)**

Result Notes **KPUD provided WUTC with current versions of its OMM/ERP, which contains updated emergency contact information.**

KPUD OMM/ERP, Section 19.12 - Emergency Personnel & Equipment 192.615(a)(4), Page 19-12.

KPUD OMM/ERP, Section 19.13 - Internal Emergency Contact List, Page 19-12.

KPUD OMM/ERP, Section 19.14 - Local Emergency Officials, Page 19-13.

Very recently, there were a few personnel changes at KPUD. The operator communicated that a submission with updated contacts will be made to the WUTC.

279. Question Result, ID, References **Sat, RPT.NR.19218NOTIF.P, 192.18(c) (192.506(b), 192.607(e)(4), 192.607(e)(5), 192.624(c)(2)(iii), 192.624(c)(6), 192.632(b)(3), 192.710(c)(7), 192.712(d)(3)(iv), 192.712(e)(2)(i)(E), 192.921(a)(7), 192.937(c)(7), 191.1(a), 192.8(b)(2), 192.9(g), 192.9(h))**
- Question Text *Do the procedures include provisions for each of the required types of notifications to PHMSA per §192.18?*
- Assets Covered **88970 (1,934)**
- Result Notes **KPUD OMM, Section 3.7 - Determination of Onshore Gathering & Regulated Onshore Pipelines 192.8, Page 3-7.**
- KPUD OMM, Section 4.13 - Verification of Pipeline Material & Attributes 192.607, Page 4-10.**
- KPUD OMM, Section 11.1 - Valve Inspections: Transmission Lines 192.745, Page 11-2.**
- KPUD OMM, Section 11.3 - Transmission Line Valve Design Requirements 192.179, Pages 11-3 and 11-4.**
- KPUD OMM, Section 11.7 - Transmission Lines: Onshore Valve Shut-off for Rupture Mitigation 192.634, Pages 11-7 through 11-9.**
- KPUD OMM, Section 15.4 - Repair Criteria for Onshore Transmission Pipelines 192.71, Pages 15-7 and 15-8.**
- KPUD OMM, Section 17.4 - Transmission Lines: Spike Hydrostatic Pressure 192.506, Page 17-3.**
280. Question Result, ID, References **NA, RPT.NR.19218NOTIF.R, 192.18(c) (192.506(b), 192.607(e)(4), 192.607(e)(5), 192.624(c)(2)(iii), 192.624(c)(6), 192.632(b)(3), 192.710(c)(7), 192.712(d)(3)(iv), 192.712(e)(2)(i)(E), 192.921(a)(7), 192.937(c)(7), 191.1(a), 192.8(b)(2), 192.9(g), 192.9(h), 192.909(b), 192.805(i))**
- Question Text *Do the records indicate proper and timely notifications to PHMSA for each notification type as required by §192.18(c)?*
- Assets Covered **88970 (1,934)**
- Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
281. Question Result, ID, References **NA, RPT.NR.CONSTRUCTIONREPORT.R,**
- Question Text *Do records indicate the operator has filed a proposed construction report for construction or replacement of any segment of gas transmission pipeline of at least 100 feet in length?*
- Assets Covered **88970 (1,934)**
- Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
282. Question Result, ID, References **NA, RPT.NR.PRESSURETESTNOTIFY.R,**
- Question Text *Do records indicate that the operator notified the commission 3 days prior to commencement of any pressure test of a gas pipeline that will have a MAOP that produces a hoop stress of twenty percent or more of the specified minimum yield strength?*
- Assets Covered **88970 (1,934)**
- Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
283. Question Result, ID, References **NA, RPT.NR.PROXIMITYREQUEST.R,**
- Question Text *Do records demonstrate that the operator is in compliance with the proximity consideration requirements in WAC 480-93-020?*
- Assets Covered **88970 (1,934)**
- Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

RPT.RR: Regulatory Reporting (Traditional)

284. Question Result, ID, References **Sat, RPT.RR.ANNUALREPORT.R, 191.17(a) (191.1(a), 192.8(c)(3), 192.8(c)(4), 192.8)**
- Question Text *Have complete and accurate Annual Reports utilizing the most recent form F 7 100.2-1 been submitted?*
- Assets Covered **88970 (1,934)**

Result Notes CY 2022 AR submitted on 2/09/2023

CY 2023 AR submitted on 3/13/2024

CY 2024 AR submitted on 3/11/2025

All annual reports were complete and accurate.

285. Question Result, ID, References Sat, RPT.RR.CONSTRUCTIONDEFECTS.R,
Question Text *Do records indicate that the operator has submitted timely and complete reports of construction defects and material failures that resulted in leaks?*
Assets Covered 88970 (1,934)
Result Notes Reviewed KPUD's Construction Defects and Material Failures Report for 2022-2024. Complete reports were submitted timely.
286. Question Result, ID, References NA, RPT.RR.IMMEDREPORT.R, 191.5(a) (191.7(a), 191.1(a), 192.8(c)(3))
Question Text *Do records indicate immediate notifications of incidents were made in accordance with §191.5?*
Assets Covered 88970 (1,934)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
287. Question Result, ID, References NA, RPT.RR.INCIDENTREPORT.R, 191.15(a) (192.624(a)(1), 192.624(a)(2), 191.1(a), 192.8(c)(3))
Question Text *Do records indicate reportable incidents were identified and reports were submitted to DOT on the most recent Form within the required timeframe?*
Assets Covered 88970 (1,934)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
288. Question Result, ID, References NA, RPT.RR.INCIDENTREPORTSUPP.R, 191.15(d) (191.1(a), 192.8(c)(3))
Question Text *Do records indicate accurate supplemental incident reports were filed as soon as practicable with a clear reference by date to the original report?*
Assets Covered 88970 (1,934)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
289. Question Result, ID, References NA, RPT.RR.FAILUREANALYSIS.R,
Question Text *Do records indicate that the operator submits failure analysis reports within 5 days of completion for incidents or hazardous conditions due to construction defects or material failures?*
Assets Covered 88970 (1,934)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
290. Question Result, ID, References NA, RPT.RR.SRCR.R, 191.23(a) (191.23(b), 191.25(a), 191.25(b), 191.25(c), 191.1(a), 192.8(c)(3))
Question Text *Do records indicate Safety-Related Condition Reports were filed as required?*
Assets Covered 88970 (1,934)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
291. Question Result, ID, References Sat, RPT.RR.NPMSANNUAL.R, 191.29(a) (191.29(b))
Question Text *Do records indicate NPMS submissions were completed each year, on or before March 15, representing all in service, idle and retired assets as of December 31 of the previous year (excludes distribution lines and gathering lines) occurred, and that if no modifications occurred, an email was submitted stating that fact?*
Assets Covered 88970 (1,934)
Result Notes Reviewed 2023 NPMS submission submitted on 1/03/2023 for CY 2022 - No change confirmation.

Reviewed 2024 NPMS submission submitted on 3/12/24 for CY 2023 - No changes - "No issues were found in the data."

Reviewed 2025 NPMS submission submitted on 2/21/2025 for CY 2024 - No changes.

292. Question Result, ID, References **Sat, RPT.RR.PIPELINEMAPPING.R,**
 Question Text *Do records indicate that accurate maps (or updates) are provided for pipelines operating over 250 PSIG to specifications developed by the commission and sufficient to meet the needs of first responders?*
 Assets Covered **88970 (1,934)**
 Result Notes **KPUD submitted accurate maps in 2020 and there have been no changes since that submission.**
293. Question Result, ID, References **Sat, RPT.RR.OPID.R, 191.22(a) (191.22(c), 191.22(d), 191.1(a), 192.8(c)(3))**
 Question Text *Do records indicate appropriate obtaining, and control of, Operator Identification Numbers (OPIDs), including changes in entity, acquisition/divestiture, and construction/update/uprate?*
 Assets Covered **88970 (1,934)**
 Result Notes **OPID requested on 2/19/2018. OPID for KPUD is 39809. There are no changes since the installation of the pipeline.**
294. Question Result, ID, References **NA, RPT.RR.DIRTREPORTS.R,**
 Question Text *Do records indicate that the operator has submitted reports of damage to the commission using the damage information reporting tool (DIRT) within 45 days?*
 Assets Covered **88970 (1,934)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

SRN.GENERAL: General Screening Questions

295. Question Result, ID, References **NIC, SRN.GENERAL.PROCEDORG.S, N/A**
 Question Text *How are the procedures organized?*
 Assets Covered **88970 (1,934)**
 Result Notes **Klickitat PUD's procedures are organized into the operations and maintenance (OM), operator qualification (OQ), and public awareness (PA) manuals. Klickitat PUD includes its emergency response and damage prevention plans in the OM manual.**
296. Question Result, ID, References **NIC, SRN.GENERAL.RECORDLOCATE.S, N/A**
 Question Text *How are records organized and stored, and are there limitations to reviewing them?*
 Assets Covered **88970 (1,934)**
 Result Notes **Klickitat PUD's records are stored electronically by Everline and Everline/KPUD personnel have access to the records.**
297. Question Result, ID, References **NA, SRN.GENERAL.ASSETCHANGE.S, N/A**
 Question Text *Describe the significant asset acquisitions, mergers, and divestitures in the last five years.*
 Assets Covered **88970 (1,934)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review. There have not been any asset acquisitions, mergers, or divestitures in the previous 5 years.**
298. Question Result, ID, References **NA, SRN.GENERAL.SYSTEMCHGS.S, N/A**
 Question Text *Have there been any significant changes in the pipeline system configuration in the last 5 years?*
 Assets Covered **88970 (1,934)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review. There have not been any significant changes in the pipeline system configuration in the past 5 years.**
299. Question Result, ID, References **NA, SRN.GENERAL.GRANDFATHER.S, N/A**
 Question Text *Are there any facilities or components grandfathered under various code requirements? (Provide details)*
 Assets Covered **88970 (1,934)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

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

300. Question Result, ID, References **NA, SRN.AR-PA.ASSESSNONHCA.S, N/A**
Question Text *What is the status of your program to assess transmission lines outside of an HCA?*
Assets Covered **88970 (1,934)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review. There are no qualifying pipeline segments.**

SRN.MO-GOCLASS: MO - Gas Pipeline Class Location

301. Question Result, ID, References **NIC, SRN.MO-GOCLASS.CLASSLOCATEMAOPREV.S, N/A**
Question Text *Has there been a class location change occur in the past 3 years that required a study and the subsequent confirmation or revision of the pipeline segment's MAOP?*
Assets Covered **88970 (1,934)**
Result Notes **There has not been a class location change in the past 3 years. KPUD conducted a class location, HCA, and MCA analysis on 8/15/2023 and re-ran its analysis on 2/26/2024 after adding the secondary line. The operator conducted an annual field verification on 5/15/2024 and an annual review using satellite imagery and field verification on 5/26/2024. No changes to class location, HCA, and MCA results.**

SRN.MO-RECONF: MO - MAOP Reconfirmation

302. Question Result, ID, References **NIC, SRN.MO-RECONF.MAOPMETHODS.S, N/A**
Question Text *Which MAOP Reconfirmation Methods do you plan to use or have used?*
Assets Covered **88970 (1,934)**
Result Notes **KPUD has not used any MAOP reconfirmation methods. Should MAOP reconfirmation be required (currently not applicable), KPUD's OM manual, Section 9.3 - Reconfirmation of MAOP 192.624, Page 9-5, approves any method under 192.624(c).**

SRN.MO-MCA: MO - Moderate Consequence Areas (MCA)

303. Question Result, ID, References **NIC, SRN.MO-MCA.MCAIDENTIFY.S, N/A**
Question Text *Has the operator completed their review and identification of Moderate Consequence Areas (MCAs)?*
Assets Covered **88970 (1,934)**
Result Notes **KPUD conducted a class location, HCA, and MCA analysis on 8/15/2023 and re-ran its analysis on 2/26/2024 after adding the secondary line. The operator conducted an annual field verification on 5/15/2024 and an annual review using satellite imagery and field verification on 5/26/2024. There are no HCAs or MCAs identified along Klickitat PUD's pipeline system.**

SRN.MO-GOMAOP: MO - Gas Pipeline MAOP

304. Question Result, ID, References **NIC, SRN.MO-GOMAOP.MAOPDETERMINATION.S, N/A**
Question Text *Does the operator have any pipelines where the MAOP was determined by §192.619(a)(2) or §192.619(c)?*
Assets Covered **88970 (1,934)**
Result Notes **Reviewed 2017 RNG Pipeline - WUTC Calculations conducted by McMillen Jacobs Associates. Reviewed McMillen Jacobs Associates/Rockford Corporation hydrostatic test documents from 2018. Reviewed KPUD OMM, Section 3.1 - Pipeline System(s) Description, Page 3-1. KPUD operates its pipeline with an MAOP of 900 psig based on test pressure divided by a factor determined in Table 1 of 192.619(a)(2)(ii).**

TD.ATM: Atmospheric Corrosion

305. 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 **88970 (1,934)**

Result Notes There are two aboveground pipeline locations: at KPUD's plant and at the Williams gate station.

Reviewed RNG Pipeline Project Field Coating Procedure from 2018. Reviewed KPUD OMM, Section 10.10 - Atmospheric Corrosion 192.479, .481, Page 10-12. Reviewed KPUD OMM, Section 10.11 - Atmospheric Corrosion Inspection 192.479, Page 10-13.

Reviewed Form 8 - Atmospheric Corrosion Survey conducted by Eric Larson of Everline on 11/15/2022, which documents no corrosion and paint in great condition. Previous atmospheric corrosion inspection conducted on 6/30/2021 and covered in previous inspection.

306. 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 88970 (1,934)

Result Notes There are two aboveground pipeline locations: at KPUD's plant and at the Williams gate station.

Reviewed KPUD OMM, Section 10.10 - Atmospheric Corrosion 192.479, .481, Page 10-12. Reviewed KPUD OMM, Section 10.11 - Atmospheric Corrosion Inspection 192.479, Page 10-13.

Reviewed Form 8 - Atmospheric Corrosion Survey conducted by Eric Larson of Everline on 11/15/2022, which documents no corrosion and paint in great condition. Previous atmospheric corrosion inspection conducted on 6/30/2021 and covered in previous inspection.

307. 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 88970 (1,934)

Result Notes Aboveground piping at KPUD plant and Williams gate station is adequately protected. Soil-to-air interfaces of Pipeline A and Pipeline B are good at both ends of pipeline.

TD.CPMONITOR: External Corrosion - CP Monitoring

308. Question Result, ID, Sat, TD.CPMONITOR.MONITORCRITERIA.R, 192.491(c) (192.463(a), 192.9(f)(1), 182.452, 192.453, References 192.491)

Question Text *Do records document that the CP monitoring criteria used was acceptable?*

Assets Covered 88970 (1,934)

Result Notes KPUD OMM, Section 10.5 - Cathodic Protection Survey 192.463, .465(a), Page 10-8. KPUD uses -850mV and 100mV shift criteria. Coupons and CuCuSO4 are equipped at each test station. The records verified this.

309. 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 88970 (1,934)

Result Notes CP Test Station #1: -1243 mV CSE (Both Pipeline A and B)

CP Test Station #5: -1489 mV CSE (Pipeline A); -1490 mV CSE (Pipeline B)

CP Test Station #11: -1746 mV CSE (Pipeline A); -1733 mV CSE (Pipeline B)

Calibration: Multimeter due 4/09/2026; half-cell due 8/06/2025

Jonathan Lemon's OQ (EWN-493701): Task ID: 0001 - Measure Structure-To-Electrolyte Potential (1:1) - Expires on 1/09/2026

310. 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 88970 (1,934)

Result Notes Reviewed Form F-7 and Form 6 - Cathodic Protection Survey for cathodic protection tests from 2022-2024. CP tests were conducted by Roy Rogers on 5/31/22, and by Jonathan Lemon on 5/11/23 and 5/15/24. All pipe-to-soil potential readings were good.

311. Question Result, ID, References NA, 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 88970 (1,934)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review. KPUD uses galvanic anodes.
312. Question Result, ID, References NA, TD.CPMONITOR.CURRENTTEST.O, 192.465(b)
Question Text *Are impressed current sources properly maintained and are they functioning properly?*
Assets Covered 88970 (1,934)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
313. Question Result, ID, References NA, 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 88970 (1,934)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
314. Question Result, ID, References NA, 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 88970 (1,934)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
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 88970 (1,934)
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 88970 (1,934)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
317. 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 88970 (1,934)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
318. 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 88970 (1,934)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
319. 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 88970 (1,934)

Result Notes There are 11 test stations that are approximately 1,200 feet apart. Reviewed map of test stations and shows a sufficient number of test stations for Pipeline A and Pipeline B.

320. Question Result, ID, Sat, TD.CPMONITOR.TESTLEAD.R, 192.491(c) (192.471(a), 192.471(b), 192.471(c), 192.9(f)(1),
References 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 88970 (1,934)

Result Notes Reviewed WUTC Drawings Map and SP3 that both show the aerial view of all 11 CP test station locations along the pipeline. Reviewed Form F-7 and Form 6 for 2022-2024 that document all 11 CP test station reads. Test leads are installed in accordance with the requirements of Subpart I.

321. Question Result, ID, NA, TD.CPMONITOR.INTFRCURRENT.R, 192.491(c) (192.473(a), 192.9(f)(1), 192.452, 192.453,
References 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 88970 (1,934)

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

322. Question Result, ID, NA, TD.CPMONITOR.INTFRCURRENT.O, 192.473(a)
References

Question Text *Are areas of potential stray current identified, and if found, the detrimental effects of stray currents minimized?*

Assets Covered 88970 (1,934)

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

323. Question Result, ID, NA, TD.CPMONITOR.INTFRCURRENTDES.R, 192.491(c) (192.473(b))
References

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 88970 (1,934)

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

324. Question Result, ID, NA, TD.CPMONITOR.INTFRCURRENTSURV.R, 192.491(c) (192.473(c)(1), 192.473(c)(2))
References

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 88970 (1,934)

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

325. Question Result, ID, NA, TD.CPMONITOR.INTFRCURRENTREM.R, 192.491(c) (192.473(c)(3), 192.473(c)(4))
References

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 88970 (1,934)

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

TD.CP: External Corrosion - Cathodic Protection

326. Question Result, ID, Sat, TD.CP.POST1971.R, 192.491(c) (192.455(a), 192.457(a), 192.452(a), 192.452(b), 192.455(f),
References 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 88970 (1,934)

Result Notes Magnesium ribbon anodes installed during construction in 2018. Reviewed design records.

327. Question Result, ID, NA, TD.CP.PRE1971.O, 192.457(b)
References

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 88970 (1,934)

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

328. 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 88970 (1,934)

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

329. 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 88970 (1,934)

Result Notes Reviewed CP readings in Form 6 - Cathodic Protection Survey for 2023-2024, which were conducted on 5/11/23 and 5/15/24. Jonathan Lemon of Everline recorded the pipe-to-soil potentials of both the KPUD pipeline and the Williams pipeline at the gate station. Electrical isolation is good.

330. 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 88970 (1,934)

Result Notes KPUD's pipeline is electrically isolated from Williams' pipeline.

KPUD's side of isolation flange: -1627 mV CSE

Williams' side of isolation flange: -342 mV CSE

331. 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 88970 (1,934)

Result Notes Reviewed CP readings in Form 6 - Cathodic Protection Survey for 2023-2024, which were conducted on 5/11/23 and 5/15/24. Jonathan Lemon of Everline recorded the pipe-to-soil potentials of both the KPUD pipeline and the Williams pipeline at the gate station. Electrical isolation is good.

332. Question Result, ID, References NA, TD.CP.CASINGINSPECT.R,

Question Text *Do records indicate that annual casing inspections have been performed to ensure electrical isolation from the pipeline?*

Assets Covered 88970 (1,934)

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

333. Question Result, ID, References NA, TD.CP.CASINGINSPECT.O,

Question Text *Are casings electrically isolated from the pipeline?*

Assets Covered 88970 (1,934)

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

334. 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 88970 (1,934)

Result Notes Reviewed map in SP3, WUTC Drawings Map, and map associated with 2022 CP inspection with Roy Rogers. Records indicated the location of all items listed in 192.491(a).

TD.COAT: External Corrosion - Coatings

335. Question Result, ID, **Sat**, TD.COAT.NEWPIPE.R, 192.491(c) (192.455(a)(1), 192.461(a), 192.461(b), 192.483(a), 192.9(f)(1),
References 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 88970 (1,934)
Result Notes Reviewed initial construction records. KPUD pipeline is coated with fusion bonded epoxy with an abrasion resistant overlay.
336. Question Result, ID, **NA**, TD.COAT.NEWPIPEINSTALL.R, 192.491(c) (192.461(c), 192.461(d), 192.461(e), 192.483(a),
References 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 88970 (1,934)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
337. Question Result, ID, **NA**, TD.COAT.ASSESS.R, 192.491(c) (192.461(f), 192.461(g), 192.461(h), 192.461(i))
References
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 88970 (1,934)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
338. Question Result, ID, **NA**, TD.COAT.ASSESS.O, 192.461(c)
References
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 88970 (1,934)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

TD.CPEXPOSED: External Corrosion - Exposed Pipe

339. Question Result, ID, **NA**, 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 88970 (1,934)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
340. 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 88970 (1,934)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
341. 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 88970 (1,934)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
342. 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 88970 (1,934)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

TD.ICCG: Internal Corrosion - Corrosive Gas

343. 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 88970 (1,934)
Result Notes No such event occurred, or condition existed, in the scope of inspection review. Corrosive gas is not being transported by pipeline.
344. Question Result, ID, NA, TD.ICCG.CORRCONSTMONT.R, 192.491(c) (192.478(a), 192.478(b)(1), 192.478(b)(2))
References
Question Text *For onshore gas transmission, do operator records indicate monitoring the gas stream for corrosive constituents, effectively mitigating as necessary?*
Assets Covered 88970 (1,934)
Result Notes No such event occurred, or condition existed, in the scope of inspection review. KPUD only transports dry gas. The gas is processed at KPUD plant with the use of compressors, heaters, dryers, coolers, and heat exchangers to remove water, H₂S, CO₂, O₂, and N₂ prior to injecting into the pipeline. KPUD produces pipeline gas that is over 98% pure CH₄. KPUD has gas chromatograph to monitor if there is corrosive gas.
345. Question Result, ID, NA, TD.ICCG.GTEVAL.R, 192.491(c) (192.478(b)(3))
References
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 88970 (1,934)
Result Notes No such event occurred, or condition existed, in the scope of inspection review. KPUD only transports dry gas. The gas is processed at KPUD plant with the use of compressors, heaters, dryers, coolers, and heat exchangers to remove water, H₂S, CO₂, O₂, and N₂ prior to injecting into the pipeline. KPUD produces pipeline gas that is over 98% pure CH₄. KPUD has gas chromatograph to monitor if there are corrosive constituents in the gas being transported.
346. Question Result, ID, NA, TD.ICCG.CORRGASREVIEW.R, 192.491(c) (192.478(c))
References
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 88970 (1,934)
Result Notes No such event occurred, or condition existed, in the scope of inspection review. No such event occurred, or condition existed, in the scope of inspection review. KPUD only transports dry gas. The gas is processed at KPUD plant with the use of compressors, heaters, dryers, coolers, and heat exchangers to remove water, H₂S, CO₂, O₂, and N₂ prior to injecting into the pipeline. KPUD produces pipeline gas that is over 98% pure CH₄. KPUD has gas chromatograph to monitor if there are corrosive constituents in the gas being transported.

TD.ICP: Internal Corrosion - Preventive Measures

347. Question Result, ID, NA, TD.ICP.EXAMINE.R, 192.491(c) (192.475(a), 192.475(b), 192.9(f)(1), 192.452, 192.453, 192.491) References
Question Text *Do records document examination of removed pipe for evidence of internal corrosion?*
Assets Covered 88970 (1,934)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
348. Question Result, ID, NA, TD.ICP.EXAMINE.O, 192.475(a) (192.475(b))
References
Question Text *Is removed pipe examined for evidence of internal corrosion?*
Assets Covered 88970 (1,934)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
349. Question Result, ID, NA, TD.ICP.EVALUATE.R, 192.491(c) (192.9(f)(1), 192.452, 192.453, 192.485(a), 192.485(c), 192.491, References 192.712(b))
Question Text *Do records document adequate evaluation of internally corroded pipe?*
Assets Covered 88970 (1,934)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

350. 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 **88970 (1,934)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

TQ.PROT9: OQ Protocol 9

351. Question Result, ID, References **NA, TQ.PROT9.CORRECTION.O, 192.801(a) (192.809(a))**
Question Text *Have potential issues identified by the OQ plan inspection process been corrected at the operational level?*
Assets Covered **88970 (1,934)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review. KPUD reviewed the OQ plan annually, but no changes were made during this inspection cycle.**
352. Question Result, ID, References **Sat, TQ.PROT9.TASKPERFORMANCE.O, 192.801(a) (192.809(a))**
Question Text *Verify the qualified individuals performed the observed covered tasks in accordance with the operator's processes or operator approved contractor processes.*
Assets Covered **88970 (1,934)**
Result Notes **Jonathan Lemon performed all observed covered tasks on 10/07/2025 in accordance with the operator's processes.**
353. Question Result, ID, References **Sat, TQ.PROT9.QUALIFICATIONSTATUS.O, 192.801(a) (192.809(a))**
Question Text *Verify the individuals performing the observed covered tasks are currently qualified to perform the covered tasks.*
Assets Covered **88970 (1,934)**
Result Notes **Jonathan Lemon's OQs (EWN-493701):**
- Task ID: 0301 - Open and Close Valves Manually (1:3) - Expires on 1/12/2026**
 - Task ID: 0331- Perform Valve Visual Inspection and Partial Operation (1:2) - Expires on 2/26/2027**
 - Task ID: 1261 - Perform Walking Gas Leakage Survey (1:1) - Expires on 1/13/2026**
 - Task ID: 1311 - Inspect Pipeline Surface Conditions by Patrolling Right-of-Way or Easement (1:1) - Expires on 1/13/2026**
 - Task ID: 0141 - Perform Visual Inspection for Atmospheric Corrosion (1:1) - Expires on 1/19/2027**
 - Task ID: 0001 - Measure Structure-To-Electrolyte Potential (1:1) – Expires on 1/09/2026**
 - Task ID: 0071 - Inspect of Test Cathodic Protection Electrical Isolation Devices (1:1) – Expires on 2/28/2027**
 - Task ID: 1211 - Perform Periodic Sampling of Odorization (1:1) – Expires on 1/12/2026**
354. Question Result, ID, References **Sat, TQ.PROT9.AOCRECOG.O, 192.801(a) (192.809(a))**
Question Text *Verify the individuals performing covered tasks are cognizant of the AOCs that are applicable to the tasks observed.*
Assets Covered **88970 (1,934)**
Result Notes **Jonathan Lemon was aware of the AOCs applicable to the tasks he completed on 10/07/25. Jonathan is qualified for AOCs under Task ID: 0003 - Abnormal Operating Conditions: Gas AOCs (1:0), which expires on 4/22/2027.**
355. Question Result, ID, References **Sat, TQ.PROT9.VERIFYQUAL.O, 192.801(a) (192.809(a))**

Question Text *Observe in the field (job site, local office, etc.) that the foreman/supervisor/manager has verified the qualification of the individual performing the task, that the qualification records are current, and ensure the personal identification of all individuals performing covered tasks are checked, prior to task performance.*

Assets Covered 88970 (1,934)

Result Notes Reviewed Jonathan Lemon's qualifications via QR code on EWN OQ card prior to task performance. Reviewed OQ Report for Jonathan Lemon during records portion of inspection with Doug Erickson of Everline. All qualifications are current.

TQ.OQ: Operator Qualification

356. Question Result, ID, References Sat, TQ.OQ.OQCONTRACTOR.R, 192.807(a) (192.807(b))

Question Text *Are adequate records containing the required elements maintained for contractor personnel?*

Assets Covered 88970 (1,934)

Result Notes Reviewed OQ Report for all operator personnel performing covered tasks. This information was exported from Energy WorldNet and contains the required elements for contractor personnel.

357. Question Result, ID, References Sat, TQ.OQ.RECORDS.R, 192.807

Question Text *Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified?*

Assets Covered 88970 (1,934)

Result Notes Reviewed OQ Report for all operator personnel performing covered tasks. This information was exported from Energy WorldNet. All employees up to date.

358. Question Result, ID, References Sat, TQ.OQ.TRAINING.R, 192.807(a) (192.807(b))

Question Text *Does the operator have records for initial qualification, re-training and re-evaluation of individuals performing covered tasks?*

Assets Covered 88970 (1,934)

Result Notes Reviewed OQ Report for all operator personnel performing covered tasks. This information was exported from Energy WorldNet. All employees up to date.

359. Question Result, ID, References Sat, TQ.OQ.ABNORMAL.R, 192.807(a) (192.807(b), 192.803)

Question Text *Do records document evaluation of qualified individuals for recognition and reaction to AOCs?*

Assets Covered 88970 (1,934)

Result Notes Reviewed OQs for Jonathan Lemon and Eric Larson.

Eric Larson - EWN-721842 - Task ID 10351 - EWN-CBT-Abnormal Operating Conditions: Gas AOCs - Completed 6/16/2022 and valid until 6/16/2025 (Retired in May of 2024).

Jonathan Lemon - EWN-493701 - Task ID 13051 - EWN-CBT-Abnormal Operating Conditions: Gas AOCs - Completed 4/22/2024 and valid until 4/22/2027.

TQ.QU: Qualification of Personnel - Specific Requirements

360. Question Result, ID, References Sat, TQ.QU.CORROSION.R, 192.453 (192.807(a), 192.807(b))

Question Text *Do records indicate qualification of personnel implementing pipeline corrosion control methods?*

Assets Covered 88970 (1,934)

Result Notes Reviewed OQs for Roy Rogers with Cathodic Protection Engineering for 2022. Reviewed OQs for Eric Larson and Jonathan Lemon with Everline for 2023-2024. All OQs for corrosion control methods were up to date while performing covered tasks on KHUD's system.

361. Question Result, ID, References NA, TQ.QU.EXCAVATE.R, 192.807(a) (192.807(b), ADB-2006-01, 192.801, 192.328)

Question Text *Do records indicate qualification of individuals who oversee marking, trenching, and backfilling operations?*

Assets Covered 88970 (1,934)

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

Reviewed OQs for Everline contractor Jonathan Lemon (EWN-493701), who is qualified for locating and backfilling.

Task ID 79621 - EWN-PE-Backfilling (0981) - Completed on 2/26/2024 and valid until 2/26/2027.

Task ID 80776 - EWN-Locate Underground Pipelines (1291) - Completed on 2/27/2024 and valid until 2/27/2027.

KPUD/Everline personnel are not qualified, nor would perform excavation duties outside of Task 65: Damage Prevention During Excavation Activities. In the case of an emergency where the pipeline needs to be exposed, KPUD would shutdown the pipeline and then contract with a qualified individual to perform the excavation.

TQ.QUOMCONST: Qualification of Personnel - Specific Requirements (O and M Construction)

362. Question Result, ID, References NA, TQ.QUOMCONST.NDT.R, 192.243(b)(2) (192.807(a), 192.807(b), 192.328(a), 192.328(b))

Question Text *Do records indicate the qualification of nondestructive testing personnel?*

Assets Covered 88970 (1,934)

Result Notes No such event occurred, or condition existed, in the scope of inspection review. No NDT since the pipelines were installed in 2018.

363. Question Result, ID, References NA, TQ.QUOMCONST.WELDER.R, 192.227(a) (192.227(b), 192.229(a), 192.229(b), 192.229(c), 192.229(d), 192.328(a), 192.328(b), 192.807(a), 192.807(b))

Question Text *Do records indicate that welders are adequately qualified?*

Assets Covered 88970 (1,934)

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

TQ.TR: Training of Personnel

364. Question Result, ID, References Sat, TQ.TR.TRAINING.R, 192.615(b)(2) (192.807(a), 192.807(b))

Question Text *Is training for emergency response personnel documented?*

Assets Covered 88970 (1,934)

Result Notes Reviewed Emergency Response Plan Review Training sign-in sheet for 2022. Reviewed Emergency Response Tabletop Exercise for 2023. Reviewed Emergency Procedure Manual Review in Maintenance Connection (KPUD's software) for 2024.

DC.CO: Construction

365. Question Result, ID, References NA, DC.CCPROT.COATLOWER.R, 192.143(b) (192.461(c)) (also presented in: DC.CCPROT)

Question Text *Do records indicate that each pipe segment with external protective coating was inspected just prior to lowering into the ditch and backfilling, and any damage detrimental to effective corrosion control was repaired?*

Assets Covered 88970 (1,934)

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

DC.DPCOPP: Design of Pipe - Overpressure Protection

366. Question Result, ID, References Sat, MO.GM.TRAPSAFETY.P, 192.750 (192.605(b), 192.801, 192.805) (also presented in: MO.GM)

Question Text *Do the procedures require all launchers and receivers to have adequate safety devices in accordance with 192.750 and to ensure the safety devices are working properly just prior to each use?*

Assets Covered 88970 (1,934)

Result Notes KPUD OMM, Section 9.15 - Launcher & Receiver Safety 192.750, Page 9-15.

367. Question Result, ID, References **NA, MO.GM.TRAPSAFETY.R, 192.750 (192.605(b), 192.801, 192.805)** (also presented in: MO.GM)
 Question Text *Does the operator have records to demonstrate whether all launchers and receivers have safety devices that were utilized prior to each use?*
 Assets Covered **88970 (1,934)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
368. Question Result, ID, References **NA, MO.GM.TRAPSAFETY.O, 192.750 (192.605(b), 192.801, 192.805)** (also presented in: MO.GM)
 Question Text *Do field observations confirm selected launchers and receivers have safety devices installed and whether the safety devices were inspected prior to each use?*
 Assets Covered **88970 (1,934)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review. KPUD has not ran an ILI tool in either pipeline since installation in 2018. There are safety devices installed at both the Williams gate station and KPUD plant sides that are capable of safely relieving pressure in the barrel.**

DC.SPT: Spike Hydrotest

369. Question Result, ID, References **Sat, DC.PT.PRESSTESTENVIRON.P, 192.515(b) (192.629(a), 192.629(b))** (also presented in: DC.PT, DC.PTLOWPRESS)
 Question Text *Does the process require that, as applicable to the project, while conducting tests under Subpart J – Test Requirements, the test medium will be disposed of in a manner that will minimize damage to the environment?*
 Assets Covered **88970 (1,934)**
 Result Notes **KPUD OMM, Section 17.2 - Personnel / Environmental Protection 192.515, Page 17-1.**
370. Question Result, ID, References **NA, DC.PT.PRESSTESTENVIRON.R, 192.515(b) (192.629(a), 192.629(b), 192.603(b))** (also presented in: DC.PT, DC.PTLOWPRESS)
 Question Text *Do records indicate while conducting tests under Subpart J – Test Requirements, the test medium disposal was conducted in a manner that minimized damage to the environment?*
 Assets Covered **88970 (1,934)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
371. Question Result, ID, References **NA, DC.PT.PRESSTESTENVIRON.O, 192.515(b) (192.629(a), 192.629(b))** (also presented in: DC.PT, DC.PTLOWPRESS)
 Question Text *Do field observations confirm while conducting tests under Subpart J – Test Requirements, the test medium was disposed of in an environmentally sound manner?*
 Assets Covered **88970 (1,934)**
 Result Notes **No such activity/condition was observed during the inspection.**
372. Question Result, ID, References **Sat, DC.PT.PRESSTESTSAFETY.P, 192.515(a) (192.629(a), 192.629(b))** (also presented in: DC.PT, DC.PTLOWPRESS)
 Question Text *Does the process require that, as applicable to the project, while conducting tests under Subpart J – Test Requirements, every reasonable precaution is taken to protect its employees and the general public throughout the testing?*
 Assets Covered **88970 (1,934)**
 Result Notes **KPUD OMM, Section 17.2 - Personnel / Environmental Protection 192.515, Page 17-1.**
373. Question Result, ID, References **NA, DC.PT.PRESSTESTSAFETY.R, 192.515(a) (192.629(a), 192.629(b))** (also presented in: DC.PT, DC.PTLOWPRESS)
 Question Text *Do records indicate while conducting tests under Subpart J – Test Requirements, every reasonable precaution was taken to protect its employees and the general public throughout the testing?*
 Assets Covered **88970 (1,934)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
374. Question Result, ID, References **NA, DC.PT.PRESSTESTSAFETY.O, 192.515(a) (192.629(a), 192.629(b))** (also presented in: DC.PT, DC.PTLOWPRESS)
 Question Text *Do field observations confirm while conducting tests under Subpart J – Test Requirements, every reasonable precaution is taken to protect its employees and the general public throughout the testing?*
 Assets Covered **88970 (1,934)**
 Result Notes **No such activity/condition was observed during the inspection.**

375. Question Result, ID, References **Sat, DC.PT.PRESSTESTRECORD.P, 192.517(a) (192.517(b))** (also presented in: DC.PT, DC.PTLOWPRESS)
 Question Text *Does the process require that, as applicable to the project, creation and retention of a record of each Subpart J test for the required duration?*
 Assets Covered **88970 (1,934)**
 Result Notes **KPUD OMM, Section 17.7 - Pressure Test Recordkeeping Requirements 192.517, Page 17-4. KPUD OMM, Section 4.2 - Record Retention 192.605(b)(3), 192.709, Page 4-1.**
376. Question Result, ID, References **NA, DC.PT.PRESSTESTRECORD.R, 192.517(a) (192.517(b))** (also presented in: DC.PT, DC.PTLOWPRESS)
 Question Text *Do records indicate creation and retention of a record for each Subpart J test performed for the required duration?*
 Assets Covered **88970 (1,934)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

DC.PTLOWPRESS: Pressure Testing - Low Pressure

377. Question Result, ID, References **NA, DC.PT.PRESSTEST.R, 192.503(a) (192.503(b), 192.503(c), 192.503(d), 192.503(e))** (also presented in: DC.PT)
 Question Text *Do records indicate that pressure testing is conducted in accordance with 192.503?*
 Assets Covered **88970 (1,934)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
378. Question Result, ID, References **NA, DC.PT.PRESSTEST.O, 192.503(a) (192.503(b), 192.503(c), 192.503(d), 192.503(e))** (also presented in: DC.PT)
 Question Text *Is pressure testing conducted in accordance with 192.503?*
 Assets Covered **88970 (1,934)**
 Result Notes **No such activity/condition was observed during the inspection.**
379. Question Result, ID, References **Sat, DC.PT.PRESSTESTENVIRON.P, 192.515(b) (192.629(a), 192.629(b))** (also presented in: DC.PT, DC.SPT)
 Question Text *Does the process require that, as applicable to the project, while conducting tests under Subpart J – Test Requirements, the test medium will be disposed of in a manner that will minimize damage to the environment?*
 Assets Covered **88970 (1,934)**
 Result Notes **KPUD OMM, Section 17.2 - Personnel / Environmental Protection 192.515, Page 17-1.**
380. Question Result, ID, References **NA, DC.PT.PRESSTESTENVIRON.R, 192.515(b) (192.629(a), 192.629(b), 192.603(b))** (also presented in: DC.PT, DC.SPT)
 Question Text *Do records indicate while conducting tests under Subpart J – Test Requirements, the test medium disposal was conducted in a manner that minimized damage to the environment?*
 Assets Covered **88970 (1,934)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
381. Question Result, ID, References **NA, DC.PT.PRESSTESTENVIRON.O, 192.515(b) (192.629(a), 192.629(b))** (also presented in: DC.PT, DC.SPT)
 Question Text *Do field observations confirm while conducting tests under Subpart J – Test Requirements, the test medium was disposed of in an environmentally sound manner?*
 Assets Covered **88970 (1,934)**
 Result Notes **No such activity/condition was observed during the inspection.**
382. Question Result, ID, References **Sat, DC.PT.PRESSTESTSAFETY.P, 192.515(a) (192.629(a), 192.629(b))** (also presented in: DC.PT, DC.SPT)
 Question Text *Does the process require that, as applicable to the project, while conducting tests under Subpart J – Test Requirements, every reasonable precaution is taken to protect its employees and the general public throughout the testing?*
 Assets Covered **88970 (1,934)**
 Result Notes **KPUD OMM, Section 17.2 - Personnel / Environmental Protection 192.515, Page 17-1.**
383. Question Result, ID, References **NA, DC.PT.PRESSTESTSAFETY.R, 192.515(a) (192.629(a), 192.629(b))** (also presented in: DC.PT, DC.SPT)

Question Text *Do records indicate while conducting tests under Subpart J – Test Requirements, every reasonable precaution was taken to protect its employees and the general public throughout the testing?*

Assets Covered 88970 (1,934)

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

384. Question Result, ID, NA, DC.PT.PRESSTESTSAFETY.O, 192.515(a) (192.629(a), 192.629(b)) (also presented in: DC.PT, References DC.SPT)

Question Text *Do field observations confirm while conducting tests under Subpart J – Test Requirements, every reasonable precaution is taken to protect its employees and the general public throughout the testing?*

Assets Covered 88970 (1,934)

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

385. Question Result, ID, References Sat, DC.PT.PRESSTESTRECORD.P, 192.517(a) (192.517(b)) (also presented in: DC.PT, DC.SPT)

Question Text *Does the process require that, as applicable to the project, creation and retention of a record of each Subpart J test for the required duration?*

Assets Covered 88970 (1,934)

Result Notes KPUD OMM, Section 17.7 - Pressure Test Recordkeeping Requirements 192.517, Page 17-4. KPUD OMM, Section 4.2 - Record Retention 192.605(b)(3), 192.709, Page 4-1.

386. Question Result, ID, References NA, DC.PT.PRESSTESTRECORD.R, 192.517(a) (192.517(b)) (also presented in: DC.PT, DC.SPT)

Question Text *Do records indicate creation and retention of a record for each Subpart J test performed for the required duration?*

Assets Covered 88970 (1,934)

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

MO.GOCLASS: Gas Pipeline Class Location

387. 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, 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 88970 (1,934)

Result Notes KPUD OMM, Section 8.3 - Continuing Surveillance 192.613, Pages 8-4 and 8-5.

388. 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, 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 88970 (1,934)

Result Notes KPUD did not recondition, phase out, or reduce the MAOP in any pipeline segment that was determined to be in unsatisfactory condition but on which no immediate hazard existed.

Reviewed walking patrol records for 2022-2024. KPUD used Form F-17 - Pipeline Patrol Report during 2022 and used Form 3(a) - Pipeline Patrol during 2023-2024. No AOCs, no new structures, no erosion, no construction activity, and no SRCs were observed during patrols.

Reviewed Form 3(b) - Leakage Survey records for 2022-2024. No leaks were detected on Pipeline A or B in any leak survey.

389. Question Result, ID, Sat, 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 88970 (1,934)

Result Notes Walked the entire pipeline with Jonathan Lemon of Everline on 10/07/25 while he was performing pipeline patrol and leak survey. No unsatisfactory conditions were observed.

Jonathan Lemon's OQ (EWN-493701):

Task ID: 1311 - Inspect Pipeline Surface Conditions by Patrolling Right-of-Way or Easement (1:1) - Expires on 1/13/2026

Task ID: 1261 - Perform Walking Gas Leakage Survey (1:1) - Expires on 1/13/2026

Task ID: 0141 - Perform Visual Inspection for Atmospheric Corrosion (1:1) - Expires on 1/19/2027

MO.GO: Gas Pipeline Operations

390. Question Result, ID, References Sat, IM.QA.IMMOC.P, 192.911(k) (192.13(d), 192.909(a), 192.909(b)) (also presented in: IM.QA)

Question Text *Is the process for management of changes that may impact pipeline integrity adequate?*

Assets Covered 88970 (1,934)

Result Notes KPUD OMM, Section 20, Form 25 - Management of Change.

KPUD OMM, Section 1.6 - Operating Personnel Review 192.605(b)(8)(c)(4), Page 1-4.

KPUD OMM, Section 9.2 - Establishing MAOP 192.619, Page 9-1.

KPUD OMM, Section 8.2 - Continuing Surveillance 192.613, Page 8-4.

KPUD OMM, Section 19.21 - Placing System Back into Service 192.605(b)(5), Page 19-25.

MO.GMOPP: Gas Pipeline Overpressure Protection

391. Question Result, ID, References Sat, MO.GM.RECORDS.P, 192.605(b)(1) (192.709(a), 192.709(b), 192.709(c)) (also presented in: MO.GM)

Question Text *Does the process include a requirement that the operator maintain a record of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test?*

Assets Covered 88970 (1,934)

Result Notes KPUD OMM, Section 4.2 - Record Retention 192.605(b)(3), 192.709, Page 4-1.

392. Question Result, ID, References Sat, MO.GM.RECORDS.R, 192.605(b)(1) (192.243(f), 192.709(a), 192.709(b), 192.709(c)) (also presented in: MO.GM)

Question Text *Do records indicate that records are maintained of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test?*

Assets Covered 88970 (1,934)

Result Notes Reviewed Form F-17 - Pipeline Patrol Report, Form 3(a) - Pipeline Patrol, and Form 3(b) - Leakage Survey for 2022-2024. No repairs have been performed on the pipeline since it was installed in 2018.

PD.PA: Public Awareness

393. Question Result, ID, References 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 88970 (1,934)

Result Notes Reviewed Form F-36 - Documenting First Responder Liaison Efforts for 2021. Reviewed 2021 emails sent to emergency responders with KPUD's public awareness plan attached. Reviewed public officials and emergency officials lists for 2022-2024. Reviewed Bickleton/Roosevelt FD site visit documentation for 2025. Reviewed local emergency officials list in KPUD's ERP, Section 19.14 - Local Emergency Officials, Page 19-13.

PD.RW: ROW Markers, Patrols, Monitoring

394. 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, 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 88970 (1,934)

Result Notes KPUD OMM, Section 8.3 - Continuing Surveillance 192.613, Pages 8-4 and 8-5.

395. 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 88970 (1,934)

Result Notes KPUD did not recondition, phase out, or reduce the MAOP in any pipeline segment that was determined to be in unsatisfactory condition but on which no immediate hazard existed.

Reviewed walking patrol records for 2022-2024. KPUD used Form F-17 - Pipeline Patrol Report during 2022 and used Form 3(a) - Pipeline Patrol during 2023-2024. No AOCs, no new structures, no erosion, no construction activity, and no SRCs were observed during patrols.

Reviewed Form 3(b) - Leakage Survey records for 2022-2024. No leaks were detected on Pipeline A or B in any leak survey.

396. Question Result, ID, Sat, 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 88970 (1,934)

Result Notes Walked the entire pipeline with Jonathan Lemon of Everline on 10/07/25 while he was performing pipeline patrol and leak survey. No unsatisfactory conditions were observed.

Jonathan Lemon's OQ (EWN-493701):

Task ID: 1311 - Inspect Pipeline Surface Conditions by Patrolling Right-of-Way or Easement (1:1) - Expires on 1/13/2026

Task ID: 1261 - Perform Walking Gas Leakage Survey (1:1) - Expires on 1/13/2026

Task ID: 0141 - Perform Visual Inspection for Atmospheric Corrosion (1:1) - Expires on 1/19/2027

397. Question Result, ID, Sat, MO.RW.LEAKRECORDS.P, (also presented in: MO.RW)
References

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 88970 (1,934)

Result Notes KPUD OMM, Section 7.12 - Gas Leak Records WAC 480-93-187, Page 7-14.

TD.CPMONITOR: External Corrosion - CP Monitoring

398. 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 88970 (1,934)

Result Notes Reviewed map in SP3, WUTC Drawings Map, and map associated with 2022 CP inspection with Roy Rogers. Records indicated the location of all items listed in 192.491(a).

TD.CPEXPOSED: External Corrosion - Exposed Pipe

399. 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 88970 (1,934)

Result Notes Reviewed map in SP3, WUTC Drawings Map, and map associated with 2022 CP inspection with Roy Rogers. Records indicated the location of all items listed in 192.491(a).

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