

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

CITY OF DRAKESBORO D/B/A DRAKESBORO )  
NATURAL GAS COMPANY )  
 )  
\_\_\_\_\_)  
 )  
ALLEGED FAILURE TO COMPLY WITH KRS )  
278.495. 807 KAR 5:022, AND C.F.R. PART 192 )  
 )

CASE NO.  
2019-00065

ORDER

On February 28, 2019, the Commission initiated this proceeding to conduct a formal investigation and determine whether the city of Drakesboro d/b/a Drakesboro Natural Gas Company (Drakesboro) should be subject to penalties pursuant to KRS 278.992 for violations of minimum pipeline safety standards alleged in the February 26, 2019 inspection report prepared by Staff from the Commission’s Division of Inspections (DOI).<sup>1</sup>

The Commission conducted a hearing in this matter on March 8, 2019, and issued an Order on March 12, 2019, requiring Drakesboro to hire a qualified third-party operator to, among other requirements, conduct leak surveys and provide information on how leaks were resolved.<sup>2</sup> Drakesboro filed a written response to the allegations<sup>3</sup> and filed other documents requested by the Commission and DOI Staff; DOI Staff conducted two

---

<sup>1</sup> See Order (Ky. PSC Feb. 28, 2019), Appendix.

<sup>2</sup> Order at 2–3, (Ky. PSC Mar. 12, 2019).

<sup>3</sup> Drakesboro’s Answer (filed Mar. 22, 2019).

follow-up inspections during this matter; and the Commission conducted additional hearings on June 19, 2019, and November 15, 2019. Following the November 15, 2019 hearing, DOI Staff and Drakesboro submitted post-hearing briefs. The Commission closed this case with a final Order entered on February 25, 2021, finding that Drakesboro had 35 violation of 49 C.F.R §192, and imposing civil penalties in the amount of \$864,000.<sup>4</sup> Drakesboro was ordered to pay \$30,000 of the penalties within 180 days of the Order, with \$834,000 in civil penalties suspended conditioned upon the following:

- Drakesboro completing of the Phase I project recommended by Abacus Engineering by March 1, 2022;
- Drakesboro replacing its four regulators and performing any related work on the regulator stations necessary to make Drakesboro's system safe in the long term by March 1, 2022, unless a licensed engineer opines that a regulator station may be eliminated, in which case Drakesboro may satisfy this condition by replacing all of the regulators not eliminated and satisfying any conditions identified by the licensed engineer as being necessary to eliminate regulators within the same period;
- Drakesboro filing a plan with the Commission by March 1, 2022, for the replacement of all steel mains in its system.
- Drakesboro filing monthly progress reports, until such work is completed, on the implementation of the Phase I project and the work on the regulators, including the status of the city's efforts to obtain financing as well as copies of engineering reports, construction plans and specifications, requests for proposals, contracts, and a description of any work completed to date;

---

<sup>4</sup> Order(Ky. PSC Feb. 25, 2021) at 71–73.

- Drakesboro performing a leakage survey of its entire gas distribution system at least once each calendar year and at intervals not extending 15 months, until it replaces all steel mains in its system; and
- Drakesboro's continued use of a third-party contractor approved by DOI, consistent with the March 12, 2019 Order in this matter, to operate its gas system and perform all leak surveys, regulator inspections, cathodic protection system inspections, and major maintenance activities at least through February 2022.

On January 2, 2022, Drakesboro filed a request for an extension of time to complete required upgrades to its system. The Commission reopened this case to determine the reasonableness of that request.<sup>5</sup>

### BACKGROUND

Drakesboro, located in Muhlenberg County, Kentucky, offers retail gas service.<sup>6</sup> Mike Jones, who took office as the mayor of Drakesboro on January 2, 2019,<sup>7</sup> contacted DOI staff in early February 2019 and stated that he did not want to wait until the regularly scheduled inspection, but rather wanted DOI staff to come to Drakesboro as soon as possible due to the abrupt resignation of Eddie Brake, who had been in charge of the operation of Drakesboro's natural gas for a significant period.<sup>8</sup>

---

<sup>5</sup> Order (Ky. PSC Feb. 9, 2022). The motion has been pending since that time.

<sup>6</sup> See Order (Ky. PSC Feb. 28, 2019), Appendix: Inspection Report (February Inspection Report) at 1.

<sup>7</sup> Testimony of Mike Jones, June 19, 2019 Hearing Video Transcript (HVT) at 01:13:58–01:14:15. Mr. Jones is still the mayor of the city of Drakesboro.

<sup>8</sup> Testimony of Mike Jones June 19, 2019 HVT at 01:03:53; see also Testimony of Eddie Brake, March 8, 2019 HVT at 12:03:45-12:05:32; 12:07:45 (Mr. Brake testified that he had been in charge of Drakesboro's natural gas system).

Based on apparent issues with Drakesboro's system, DOI Staff moved up its scheduled standard periodic inspection of Drakesboro's natural gas system to February 18, 2019, and conducted the inspection from February 18, 2019, through February 21, 2019.<sup>9</sup> As previously outlined in the February 25, 2021 final Order, Drakesboro received assistance with its system from Atmos Energy Corporation, Vanguard Pipeline Inspection, LLC, and RussMar Utility Management, LLC (RussMar).<sup>10</sup>

Drakesboro filed a contract dated March 1, 2019, between Drakesboro and RussMar Utility Management (RussMar) that Drakesboro contended was "proof of [Drakesboro] contracting with a qualified third party operator of its natural gas company services."<sup>11</sup> Additionally, Mayor Jones testified at the March 8, 2019 hearing that Drakesboro was taking steps to resolve the deficiencies identified in the February Inspection Report.<sup>12</sup> He stated that Drakesboro adopted a new "zero tolerance" substance abuse policy and that all employees had since been drug tested.<sup>13</sup> He testified that Drakesboro established a new emergency plan<sup>14</sup> and schedule for completing

---

<sup>9</sup> See Opening Order (Ky. PSC Feb. 28, 2019), Appendix (February 2019 Inspection Report).

<sup>10</sup> Order (Ky. PSC Feb 25, 2021) at 3, 9.

<sup>11</sup> Drakesboro's Notice of Filing (filed Mar. 4, 2019); see also Drakesboro's Amended Notice of Filing (filed Mar. 6, 2019) (which includes the contract and an appendix describing the scope of work that was not included with the first filing).

<sup>12</sup> Testimony of Mike Jones, March 8, 2019 HVT at 01:24:25.

<sup>13</sup> Testimony of Mike Jones, March 8, 2019 HVT at 01:26:24.

<sup>14</sup> Testimony of Mike Jones, March 8, 2019 HVT at 01:28:28.

compliance tasks.<sup>15</sup> He further testified that it was Drakesboro's intent to address and fix each of the violations identified in the February Inspection Report.<sup>16</sup>

Following the March 8, 2019 hearing, the Commission entered an Order imposing conditions on Drakesboro's continued operation of its natural gas system during the pendency of this matter. The Commission ordered that (1) Drakesboro use a qualified third-party contractor approved by the Commission to operate its gas system; (2) the contractor have at least one employee dedicated to Drakesboro's system during regular working hours and on-call during nights and weekends; (3) the third-party contractor have available and provide additional qualified personnel as necessary to respond promptly to emergencies on the Drakesboro natural gas distribution system; (4) customer calls to Drakesboro's emergency number for reporting gas leaks and other emergencies be routed to and answered by the dedicated third-party contractor; (5) Drakesboro pre-authorize the third-party contractor to provide additional services as necessary to respond to a natural gas leak classified as a Grade 1 leak under the Gas Piping and Technology Committee (GPRTC) standards for grading natural gas leaks; (6) Drakesboro provide leak reports to the Commission; and (7) Drakesboro complete a leakage survey of its Drakesboro's entire natural gas distribution by April 11, 2019.<sup>17</sup>

DOI Staff conducted follow-up inspections of Drakesboro's natural gas distribution system on June 14, 2019,<sup>18</sup> and August 22, 2019,<sup>19</sup> and determined that Drakesboro had

---

<sup>15</sup> Testimony of Mike Jones, March 8, 2019 HVT at 01:31:09.

<sup>16</sup> Testimony of Mike Jones, March 8, 2019 HVT at 01:34:08.

<sup>17</sup> Order (Ky. PSC Mar.12, 2019).

<sup>18</sup> Notice of Filing (filed June 18, 2019) (June 2019 Inspection Report).

<sup>19</sup> Notice of Filing, Exhibit 1 (Ky. PSC Sept. 13, 2019) (August 2019 Inspection Report).

resolved some of the violations identified in the February 2019 Inspection Report. Specifically, DOI Staff indicated that they found that Drakesboro had resolved violation numbers 1, 2, 3, 4, 5, 6, 7, 9, 10, 11, 12, 16, 17, 18, 19, 20, 23, 24, 30, 31, and 33. However, DOI Staff found that Drakesboro had not resolved violation numbers 8, 13, 14, 15, 21, 22, 25, 26, 27, 29, 32, 34, and 35.<sup>20</sup>

### JURISDICTION

Drakesboro is a city in Muhlenberg County, Kentucky and also offers retail gas service to approximately 610 customers. KRS 278.495(2) grants the Commission authority to regulate the safety of natural gas facilities that are owned by any city and used to distribute natural gas at retail. KRS 278.992(1) provides the Commission authority to assess civil penalties for violations of minimum safety standards adopted by USDOT pursuant 49 U.S.C. § 60101, *et seq.*, and amendments thereto, and Commission regulations. Thus, the Commission has jurisdiction over Drakesboro's violations of the minimum safety standards alleged in the February 2019 Inspection Report and at issue herein.

### FINDINGS

Following the closure of this matter in February 2021, this case was reopened based on a motion for an extension of time filed by Drakesboro on January 12, 2022, to allow for an additional year to complete the ordered repairs to its system outlined in the Commission's Order dated February 25, 2021.

---

<sup>20</sup> Testimony of Melissa Holbrook, June 19, 2019 HVT at 00:07:25; *see also* June 2019 Inspection Report.

Since the final Order in this case dated February 25, 2021, DOI Staff has conducted five annual, general inspections of the Drakesboro system and one construction inspection, which indicated significant repairs have been made to the Drakesboro's system and consistent compliance with pipeline safety standards.<sup>21</sup> DOI Staff's findings were based, in part, on the assistance Drakesboro was receiving from RussMar, including the availability of experienced RussMar staff to assist Drakesboro's employees in its operation and maintenance of Drakesboro's gas system. In its inspection reports, DOI Staff continued to recommend that Drakesboro contract with a qualified third-party operator based on the inability of Drakesboro's current employees to operate the system independently.

On December 29, 2021, Drakesboro terminated its contract with Abacus Engineering and Surveying (Abacus)<sup>22</sup> and RussMar. At the time, Drakesboro had a qualified operator for its system, and retained the required third-party services from USDI Engineering & Utility Services (USDI).<sup>23</sup> DOI Staff did not object to Drakesboro retaining USDI to assist in operations and compliance. However, one of the conditions of the suspension of civil penalties was to complete the construction project recommended by Abacus.<sup>24</sup> When Drakesboro reviewed its leakage survey, cathodic protection, and leakage reports with USDI and Commission Staff, it was determined that the recommendation from Abacus was made without any evidence or field work being

---

<sup>21</sup> See June 2023 Inspection Report; Attached as an Appendix as it was not filed into the record.

<sup>22</sup> Abacus Engineering and Surveying Response to Subpoena Duces Tecum (filed Jan. 3, 2024) at unnumbered 16.

<sup>23</sup> Drakesboro's Response to Commission Staff's Second Request for Information (filed Mar. 15, 2023), Item 1(c).

<sup>24</sup> Drakesboro's Post-Hearing Brief (filed Feb. 21, 2020) at 3, Exhibit A.

completed. It was recommended that an exploratory dig be completed to determine the actual condition of the pipe. USDI did the exploratory dig in August 2023 and determined that the steel pipe was not in need of immediate replacement.

At the time of the February 25, 2021 Commission Order, there were continuing violations present in the Drakesboro gas system. During the June 14, 2019 follow-up inspection of Drakesboro's natural gas distribution system, DOI Staff found that Drakesboro had resolved violation numbers 1 through 7, 9 through 12, 16 through 20, 23, 24, 30, 31, and 33 identified in the February 2019 Inspection Report. Additionally, during the follow-up inspection conducted on August 22, 2019, DOI Staff found that Drakesboro had resolved violation numbers 8, 21, 27, 29. However, DOI Staff found that Drakesboro had not resolved violation numbers 13, 14, 15, 22, 25, 26, 32, 34, and 35.

DOI Staff indicated at the time of the September 2024 inspection all violations noted in the February 2019 inspection had been resolved. DOI Staff further noted that any remaining violations from the February 2019 inspection report were corrected by Drakesboro prior to the November 2020 inspection. However, Drakesboro was again deficient for failing to drug test its employees as well as maintain leak detection records in its September 2024 inspection.<sup>25</sup> Drakesboro has since resolved the deficiencies. Drakesboro responded that reports and photographs of all leak repairs will be maintained, and that USDI will be conducting drug testing. These violations are resolved and Drakesboro remains in compliance<sup>26</sup>

---

<sup>25</sup> Inspection Report dated Sept. 17, 2024. Response to deficiencies found on 2024 Inspection (filed Oct. 29, 2024).

<sup>26</sup> Drakesboro's Response to September 2024 Inspection Report (filed Oct. 29, 2024).



Based on Drakesboro's substantial compliance with the remediation requirements of its natural gas system and the timely payment of the \$30,000 in penalties, the Commission finds that it should consider any remaining portion of the penalties suspended to be satisfied. Additionally, the Commission finds that Drakesboro should be required to continue utilizing a third-party contractor approved by the Commission through DOI to conduct compliance activities, including an annual leak survey on its entire system. Any change in third-party contractor should be approved by the Commission in advance of any change. In the event leaks increase or cathodic protection does not meet regulatory requirements, Drakesboro should immediately replace the impacted section of pipe. Pipe in need of replacement should also be addressed in Drakesboro's Distribution Integrity Management Program (DIMP) plan.

However, the Commission notes that compliance with the conditions imposed herein will not substitute for future compliance with pipeline safety regulations, and Drakesboro's failure to comply with any such regulation will result in additional penalties regardless of its compliance with conditions described herein. Drakesboro should continue to comply with the items specifically noted below as those items were either set forth in the final Order issued February 25, 2021 or in this Order.

IT IS THEREFORE ORDERED that:

1. Drakesboro's request for an extension of time is denied as moot.
2. Drakesboro shall:
  - a. Continue the use of a third-party contractor approved by DOI, consistent with the February 25, 2021 Order in this matter, for compliance activities related to the operation of its gas system and to perform all leak surveys, regulator

inspections, cathodic protection system inspections, and major maintenance activities until sufficient and qualified staff is retained, as determined by DOI staff, to perform these functions.

b. Continue the use of qualified staff, as determined by DOI Staff, for daily operations;

c. Continue to replace pipe as need based on the recommendation of the third-party contractor;

d. Continue annual, not to exceed 15 months between each one, system-wide leakage surveys;

e. Be inspected annually by the DOI;

f. Remain in compliance with all state and federal pipeline safety standards; and

g. File notice with DOI that its third-party contractor has completed construction of all regulator stations deemed necessary as stated in the last 2024 inspection on or before October 31, 2025.

3. The Commission shall consider payment of the suspended portion of the penalties assessed in the February 25, 2021 final Order entered in this matter to be satisfied.

4. To the extent that any portion of this Order may conflict with the Order issued on February 25, 2021, the conditions set out in this Order control.

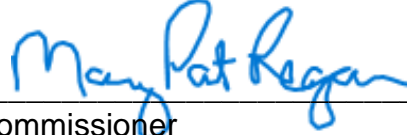
5. The case shall be closed and removed from the Commission's docket.

PUBLIC SERVICE COMMISSION



Chairman

Vice-Chairman



Commissioner

ATTEST:



Executive Director



APPENDIX

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE  
COMMISSION IN CASE NO. 2019-00065 DATED APR 10 2025

EIGHTY-SEVEN PAGES TO FOLLOW



Andy Beshear  
Governor

Rebecca W. Goodman  
Secretary  
Energy and Environment Cabinet

Commonwealth of Kentucky  
**Public Service Commission**  
211 Sower Blvd.  
P.O. Box 615  
Frankfort, Kentucky 40602-0615  
Telephone: (502) 564-3940  
psc.ky.gov

Kent A. Chandler  
Chairman

Angie Hatton  
Vice Chairman

Mary Pat Regan  
Commissioner

September 13, 2023

Mayor Eddie Brake  
Drakesboro Natural Gas  
P.O. Box 129  
Drakeboro, KY 42337

Re: Close out Letter  
Drakesboro Gas System

Mayor Brake,

On July 14, 2023, Staff from the Kentucky Public Service Commission's Division of Inspections (Staff) performed a standard inspection of the Drakesboro Natural gas system. Based on its review of the operations and records pursuant to Commission regulations, Staff prepared an Inspection Report (Inspection Report), dated July 30, 2023, in which it cited two violations of minimum federal pipeline safety standards. The operator provided a response to the Inspection Report dated May 22, 2023.

Based on the review of the September 5, 2023 response, Staff finds that Drakeboro Natural Gas system has taken sufficient corrective action to cure the two violations cited in the Inspection Report. This closes the 2023 inspection.

The violations cited in the Inspection Report, however, remain subject to administrative review for possible enforcement action under KRS 278.992(1). This letter does not exonerate The Drakesboro Natural Gas, nor relieve it of any liability for any civil penalties that may be assessed for the violation.

If you have any questions regarding this correspondence, please contact Melissa Holbrook at (502)791-0583 or by email at [melissac.holbrook@ky.gov](mailto:melissac.holbrook@ky.gov).

Sincerely,

A handwritten signature in blue ink that reads "Melissa C. Holbrook".

Melissa C. Holbrook  
Assistant Director  
Public Service Commission



Andy Beshear  
Governor

Rebecca W. Goodman  
Secretary  
Energy and Environment Cabinet

Commonwealth of Kentucky  
**Public Service Commission**  
211 Sower Blvd.  
P.O. Box 615  
Frankfort, Kentucky 40602-0615  
Telephone: (502) 564-3940  
[psc.ky.gov](http://psc.ky.gov)

Kent A. Chandler  
Chairman

Angie Hatton  
Vice Chairman

Mary Pat Regan  
Commissioner

July 24, 2023

Mayor Eddie Brake  
Drakesboro Natural Gas  
P.O. Box 129  
Drakesboro, KY 42337

Re: Standard Gas Inspection

Dear Mayor Brake:

Public Service Commission staff performed a periodic inspection of the Drakesboro gas system on July 11-14, 2023, reviewing utility operations and management practices pursuant to Commission regulations. The report of this inspection is enclosed with this letter.

Based on the inspector's observations, the following violations were identified:

1. Drakesboro Natural Gas did not submit 7100 annual report as required per CFR Part 191.11.
2. Drakesboro Natural gas did not conduct 2023 rectifier inspection as required per CFR Part 192.465 b1.

For the violations listed above, an explanation of why the violations occurred and how the violations will be remedied and prevented in the future needs to be provided. A letter addressing the organization's actions regarding the violations shall be submitted by September 5, 2023.

The above cited violation is in violation of the minimum federal safety standards for the transportation of natural gas by pipeline and as such, is subject to the maximum civil penalty not to exceed \$257,664 for each violation for each day the violation continues, except that the maximum civil penalty may not to exceed \$2,576,627 for any related series of violations as prescribed in KRS 278.992(1).

July 24, 2023

Page 2

Please review the enclosed inspection report in its entirety as you will find further information noted in regard to the inspection. If you have any questions regarding this inspection, feel free to contact Melissa Holbrook at 502-791-0583 or via email at [melissac.holbrook@ky.gov](mailto:melissac.holbrook@ky.gov).

Sincerely,



Melissa C. Holbrook  
Assistant Director DOI  
Public Service Commission

Enclosure(s)

# INSPECTION REPORT

## INSPECTION INFORMATION

KY PSC Inspector(s):	Melissa Holbrook	Report Number:	Drakesboro-07242023
Inspection Date(s):	7/11-14/2023	Report Date:	7-30-2023
Inspection Type:	<input checked="" type="checkbox"/> Standard <input type="checkbox"/> Integrity Management <input type="checkbox"/> Records and Field Review <input type="checkbox"/> Compliance Follow-up <input type="checkbox"/> Construction		

## OPERATOR INFORMATION

Name of Operator:	Drakesboro Natural Gas	OP ID No.: (If no OP ID No., explain if an application has been submitted.)	3538
Type of Operator:	Municipal	Location of office:	Drakesboro, KY
Area of Operation:	Drakesboro, KY		
<u>Official Operator Contact and Address: Must be MAYOR or Officer of Company</u>		<u>Unit Name and Address</u>	
Mayor Eddie Brake  P.O. Box 129  Drakesboro, KY 42337			
Phone # and Email:	270-602-7181 <a href="mailto:drakesborogas@gmail.com">drakesborogas@gmail.com</a>		
Records Location:	City Hall		
<u>Persons Interviewed</u>	<u>Title</u>	<u>Phone No.</u>	<u>Email</u>
Brian Jones	Utility Superintendent	270-820-0019	<a href="mailto:drakesborogas@gmail.com">drakesborogas@gmail.com</a>
Has the Operator provided an updated Emergency Contact List? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
Number of Customers:	597		
Number of Gas Employees:	4 Total		
Gas Supplier:	Texas Gas		
Unaccounted for Gas:	Unknown		
7100 Submitted Date:	# of Leaks	# Excavation Tickets	# Excavation Damages
Not submitted			# EFV's installed
Operating Pressure(s):	MAOP (range)		Actual Operating Pressure (at time of inspection range)
	Feeder:	175	125
	Town:	60	35
	Other:		
Additional Operator Information:			



Date and inspector of Last Inspection:	9-29-2022 Nantz		
Number of Violations	1	Violations not Cleared:	0

### **Summary of Areas Inspected**

<b><u>PHMSA Question Set</u></b>	
<input checked="" type="checkbox"/> Operation & Maintenance Plan Procedures <input checked="" type="checkbox"/> Emergency Plan Procedures <input checked="" type="checkbox"/> Operator Qualification Plan & Records <input checked="" type="checkbox"/> DIMP Plan review & Implementation <input checked="" type="checkbox"/> NTSB & Advisory Bulletin Questions	<input checked="" type="checkbox"/> Cyber Security Questionnaire <input checked="" type="checkbox"/> Public Awareness Effectiveness Plan & Records <input checked="" type="checkbox"/> Drug/Alcohol Plan and Records <input checked="" type="checkbox"/> Field Review <input checked="" type="checkbox"/> Protocol 9
<u>Other:</u>	

--	--

## **Summary**

The 2023 periodic standard inspection for Drakesboro Natural Gas was conducted July 11-14, 2023 in Drakesboro, KY.

The inspection consisted of an opening conference which reviewed what the inspection would entail with Brian Jones, Gas Supervisor.

The plan review portion of the inspection consisted of a detailed review of the operation and maintenance, emergency, damage prevention, operator qualification, drug and alcohol, distribution integrity management, and public awareness plans.

The 2022-2023 records pertaining to leakage surveys and repairs, 3rd party damage, valve inspections, patrolling, atmospheric corrosion, regulator inspections, public awareness, and odorant verifications were reviewed.

A field inspection was conducted, visiting various system locations in Drakesboro. An Operator Qualification Protocol 9 was conducted with Brian Allard performing an odorant sniff test.

A closing conference was held with Mayor Eddie Brake and Brian Jones, Gas Supervisor, to discuss the inspection findings.

## **Findings**

1. Drakesboro Natural Gas did not submit 7100 annual report as required per CFR Part 191.11.
2. Drakesboro Natural gas did not conduct 2023 rectifier inspection as required per CFR Part 192.465 b1.

## **Inspector Comments**

USDI will assess Drakesboro steel piping on August 2-4, 2023, focusing on Phase I per case number 2019-00065. Phase one section consists of: will entail replacement of approximately 5,000 lineal feet of steel gas line with four-inch (4") diameter polyethylene gas line. Of the total distance, 4,700 lineal feet will be replaced [beginning immediately south of Gregory's Recycling and proceed northward along Highway 431, crossing Kentucky Highway 176 and continuing northward to the intersection of Highway 431 and Cornette Street]. The remaining 300 lineal feet of line will be placed westward along Highway 176 . . . beginning at the intersection of Highway 431 with Highway 176. This will end the gas line replacement and place the tie-in just prior to the United States Post Office. Drakesboro Natural Gas is working with PHMSA to submit the annual report.

Submitted By:

---

Assistant Director DOI

## Operation & Maintenance and Emergency Plan Procedures - Reporting

**\* 1. Immediate Reporting: Incidents (detail)** *Is there a process to immediately report incidents to the National Response Center? (RPT.RR.IMMEDREPORT.P) (detail)*

191.5(b) (191.7)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec. 5 C

**\* 2. Incident Reports (detail)** *Does the process require preparation and filing of an incident report as soon as practicable but no later than 30 days after discovery of a reportable incident? (RPT.RR.INCIDENTREPORT.P) (detail)*

191.15(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 5 C

**3. Supplemental Incident Reports (detail)** *Does the process require preparation and filing of supplemental incident reports? (RPT.RR.INCIDENTREPORTSUPP.P) (detail)*

191.15(c)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 5 C

**\* 4. National Registry of Pipeline and LNG Operators (OPID) (detail)** *Does the process require the obtaining, and appropriate control, of Operator Identification Numbers (OPIDs)? (RPT.RR.OPID.P) (detail)*

191.22

Sec. 5 G

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**5. Safety Related Condition Reports (detail)** *Do the procedures require reporting of safety-related conditions? (RPT.RR.SRCR.P) (detail)*

192.605(a) (191.23(a); 191.25(a); 191.25(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 5 D

**6. Offshore Pipeline Condition Reports (detail)** *Does the process require reports to be submitted within 60 days after completing inspection of underwater pipelines in GOM and its inlets? (RPT.RR.OPCR.P) (detail)*

191.27(a) (191.27(b); 192.612(a))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Notes**  
No offshore pipes

PHMSA Form 2 Question Set (IA Equivalent)  
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

**7. Safety Related Conditions (detail)** *Does the process include instructions enabling personnel who perform operation and maintenance activities to recognize conditions that may potentially be safety-related conditions?* (MO.GO.SRC.P) (detail)

192.605(d)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec. 5 D

## Procedures - Customer and EFV Installation Notification

**1. Customer Notification (detail)** *Is a customer notification process in place that satisfies the requirements of 192.16?* (MO.GO.CUSTNOTIFY.P) (detail)

192.13(c) (192.16(a); 192.16(b); 192.16(c); 192.16(d))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec. 3 F

**2. EFV Installation (detail)** *Is there an adequate excess flow valve (EFV) installation and performance program in place?* (MO.GO.EFVINSTALL.P) (detail)

192.383(b) (192.381(a); 192.381(b); 192.381(c); 192.381(d); 192.381(e); 192.383(a); 192.383(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec. 3 G

## Procedures - Normal Operating And Maintenance

**1. Normal Maintenance and Operations (detail)** *Does the process include a requirement to review the manual at intervals not exceeding 15 months, but at least once each calendar year?* (MO.GO.OMANNUALREVIEW.P) (detail)

192.605(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 1

**2. Normal Operations and Maintenance Procedures - History (detail)** *Does the process include requirements for making construction records, maps and operating history available to appropriate operating personnel?* (MO.GO.OMHISTORY.P) (detail)

192.605(a) (192.605(b)(3))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 15 A

PHMSA Form 2 Question Set (IA Equivalent)  
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

**3. Normal Operations and Maintenance Procedures (detail)** *Does the process include procedures 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? (MO.GOMAOP.MAOPLIMIT.P) (detail)*

192.605(a) (192.605(b)(5))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 18

**4. Normal Operations and Maintenance Procedures - Review (detail)** *Does the process include requirements for periodically reviewing the work done by operator personnel to determine the effectiveness, and adequacy of the procedures used in normal operations and maintenance and modifying the procedures when deficiencies are found? (MO.GO.OMEFFECTREVIEW.P) (detail)*

192.605(a) (192.605(b)(8))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 18

**5. Safety While Making Repairs (detail)** *Does the process ensure that repairs are made in a safe manner and are made so as to prevent damage to persons and property? (AR.RMP.SAFETY.P) (detail)*

192.605(b)(9) (192.713(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 15 A

**6. Holders (detail)** *Does the process include systematic and routine testing and inspection of pipe-type or bottle-type holders? (MO.GM.HOLDER.P) (detail)*

192.605(a) (192.605(b)(10))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Notes**  
Does not apply to system

**7. Gas Odor Response (detail)** *Does the process require prompt response to the report of a gas odor inside or near a building? (MO.GO.ODDOR.P) (detail)*

192.605(a) (192.605(b)(11))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec. 2 B and G need to update plan sec 2 pg 10 with new mayor and employees

## Procedures - Continuing Surveillance

**1. Continuing Surveillance (detail)** Does the process include procedures 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? (MO.GO.CONTSURVEILLANCE.P) (detail)

192.605(e) (192.613(a); 192.613(b); 192.703(b); 192.703(c))	<b>Sat+</b>	<b>Sat</b>	<b>Concern</b>	<b>Unsat</b>	<b>NA</b>	<b>NC</b>
		x				

**Notes**  
Sec. 11 C

## Procedures - Damage Prevention Program

**1. Damage Prevention Program (detail)** Is a damage prevention program approved and in place? (PD.OC.PDPROGRAM.P) (detail)

192.614(a)	<b>Sat+</b>	<b>Sat</b>	<b>Concern</b>	<b>Unsat</b>	<b>NA</b>	<b>NC</b>
		x				

**Notes**  
Sec. 3

## Procedures - Emergency

**1. Receiving Notices (detail)** Does the emergency plan include procedures for receiving, identifying, and classifying notices of events which need immediate response? (EP.ERG.NOTICES.P) (detail)

192.615(a)(1)	<b>Sat+</b>	<b>Sat</b>	<b>Concern</b>	<b>Unsat</b>	<b>NA</b>	<b>NC</b>
		x				

**Notes**  
Sec 2

**2. Emergency Response Communication (detail)** Does the emergency plan include procedures for establishing and maintaining adequate means of communication with appropriate fire, police, and other public officials? (EP.ERG.COMMSYS.P) (detail)

192.615(a) (192.615(a)(2))	<b>Sat+</b>	<b>Sat</b>	<b>Concern</b>	<b>Unsat</b>	<b>NA</b>	<b>NC</b>
		x				

**Notes**  
Sec 2

**\* 3. Emergency Response (detail)** Does the emergency plan include procedures for making a prompt and effective response to a notice of each type of emergency, including gas detected inside or near a building, a fire or explosion near or directly involving a pipeline facility, or a natural disaster? (EP.ERG.RESPONSE.P) (detail)

192.615(a) (192.615(a)(3); 192.615(a)(11); 192.615(b)(1))	<b>Sat+</b>	<b>Sat</b>	<b>Concern</b>	<b>Unsat</b>	<b>NA</b>	<b>NC</b>
		x				

**Notes**  
Sec 2 B



PHMSA Form 2 Question Set (IA Equivalent)  
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

**4. Emergency Response (detail)** Does the process include procedures for ensuring the availability of personnel, equipment, tools, and materials as needed at the scene of an emergency? (EP.ERG.READINESS.P) (detail)

192.615(a) (192.615(a)(4))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 2D

**5. Emergency Response - Actions (detail)** Does the emergency plan include procedures for taking actions directed toward protecting people first and then property? (EP.ERG.PUBLICPRIORITY.P) (detail)

192.615(a) (192.615(a)(5))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 2 A

**6. Emergency Response (detail)** Does the emergency plan include procedures for the emergency shutdown or pressure reduction in any section of pipeline system necessary to minimize hazards to life or property? (EP.ERG.PRESSREDUCESD.P) (detail)

192.615(a) (192.615(a)(6))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes** Sec 2

**7. Emergency Response - Hazards (detail)** Does the emergency plan include procedures for making safe any actual or potential hazard to life or property? (EP.ERG.PUBLICHAZ.P) (detail)

192.605(a) (192.615(a)(7))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 2

**8. Public Official Notification (detail)** Does the emergency plan include procedures for notifying appropriate public officials of gas pipeline emergencies and coordinating with them both planned responses and actual responses during an emergency? (EP.ERG.AUTHORITIES.P) (detail)

192.615(a) (192.615(a)(8))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec. 2

**9. Service Outage Restoration (detail)** Does the emergency plan include procedures for safely restoring any service outage? (EP.ERG.OUTAGERESTORE.P) (detail)

192.615(a) (192.615(a)(9))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 2 L

PHMSA Form 2 Question Set (IA Equivalent)  
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

**10. Incident Investigation Actions (detail)** Does the process include procedures for beginning action under §192.617, if applicable, as soon after the end of the emergency as possible? (EP.ERG.INCIDENTACTIONS.P) (detail)

192.615(a) (192.615(a)(10))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**

Sec. 5 E

**11. Emergency Response Training (detail)** Does the process include training of the appropriate operating personnel to assure they are knowledgeable of the emergency procedures and verifying that the training is effective? (EP.ERG.TRAINING.P) (detail)

192.615(b)(2)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**

Sec 2 A

**12. Emergency Response Performance (detail)** Does the process include detailed steps for reviewing employee activities to determine whether the procedures were effectively followed in each emergency? (EP.ERG.POSTEVTREVIEW.P) (detail)

192.615(b)(3)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**

Sec 2 A

**13. Liaison with Public Officials (detail)** Does the process include steps for establishing and maintaining liaison with appropriate fire, police and other public officials and utility owners? (EP.ERG.LIAISON.P) (detail)

192.615(c) (192.615(c)(1); 192.615(c)(2); 192.615(c)(3); 192.615(c)(4); ADB-05-03)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**

Sec 2 A

## Procedures - Failure Investigation

**1. Incident Investigation (detail)** Does the process include procedures for analyzing accidents and failures, including the selection of samples of the failed facility or equipment for laboratory examination, where appropriate, for the purpose of determining the causes of the failure and minimizing the possibility of recurrence? (EP.ERG.INCIDENTANALYSIS.P) (detail)

192.617

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**

Sec 5 E

## Procedures - MAOP

**1. Maximum Allowable Operating pressure Determination (detail)** Does the process include procedures for determining the maximum allowable operating pressure for a pipeline segment in accordance with 192.619? (MO.GOMAOP.MAOPDETERMINE.P) (detail)

192.605(b)(1) (192.619(a); 192.619(b); 192.621(a); 192.621(b); 192.623(a); 192.623(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 6 A

## Procedures - Pressure Test

**1. Test Acceptance Criteria and Procedures (detail)** Were test acceptance criteria and procedures sufficient to assure the basis for an acceptable pressure test? (AR.PTI.PRESSTESTACCEP.P) (detail)

192.503(a) (192.503(b); 192.503(c); 192.503(d); 192.505(a); 192.505(b); 192.505(c); 192.505(d); 192.505(e); 192.507(a); 192.507(b); 192.507(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 6 D

## Procedures - Odorization Of Gas

**1. Odorization of Gas (detail)** Does the process ensure appropriate odorant levels are contained in its combustible gases in accordance with §192.625? (MO.GOODOR.ODORIZE.P) (detail)

192.605(b)(1) (192.625(a); 192.625(b); 192.625(c); 192.625(d); 192.625(e); 192.625(f))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 7

## Procedures - Tapping Pipelines Under Pressure

**1. Tapping Pipelines Under Pressure (detail)** Is the process adequate for tapping pipelines under pressure? (AR.RMP.HOTTAP.P) (detail)

192.605(b)(1) (192.627)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 16 covered task 34

**2. Qualification of Personnel Tapping Pipelines under Pressure (detail)** *Does the process require taps on a pipeline under pressure (hot taps) to be performed by qualified personnel? (TQ.QU.HOTTAPQUAL.P) (detail)*

192.627 (192.805(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 16 covered task 34

## Procedures - Pipeline Purging

**1. Pipeline Purging (detail)** *Does the process include requirements for purging of pipelines in accordance with 192.629? (MO.GOODOR.PURGE.P) (detail)*

192.605(b)(1) (192.629(a); 192.629(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 14 Covered task 58

## Procedures - Distribution System Patrolling & Leakage Survey

**1. Distribution System Leakage Surveys (detail)** *Does the process require distribution system patrolling and leakage surveys to be conducted? (PD.RW.DISTLEAKAGE.P) (detail)*

192.721 (192.721(a); 192.721(b); 192.723(a); 192.723(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 13

## Procedures - Line Marker

**1. ROW Markers Requirements (detail)** *Does the process adequately cover the requirements for placement of ROW markers? (PD.RW.ROWMARKER.P) (detail)*

192.707(a) (192.707(b); 192.707(c); 192.707(d); CGA Best Practices, v4.0, Practice 2-5; CGA Best Practices, v4.0, Practice 4-20)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 3 E

## Procedures - Test Requirements For Reinstating Service Lines

**1. Test Reinstated Service Lines (detail)** *Is the process adequate for the testing of disconnected service lines?*  
(AR.RMP.TESTREINSTATE.P) (detail)

192.605(b) (197.725(a); 197.725(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**

Sec 14 I pressure test 100psi.

## Procedures - Abandonment Or Deactivation Of Facilities

**1. Abandonment or Deactivation of Pipe and Facilities (detail)** *Does the process include procedures for the abandonment and deactivation of pipelines that are in accordance with 192.727?* (MO.GM.ABANDONPIPE.P) (detail)

192.605(b)(1) (192.727(a); 192.727(b); 192.727(c);  
192.727(d); 192.727(e); 192.727(f); 192.727(g))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**

Sec 14 covered task 58

## Procedures - Pressure Limiting And Regulating Station

**1. Pressure Limiting and Regulating Stations Inspection and Testing (detail)** *Does the process include procedures for inspecting and testing each pressure limiting station, relief device, and pressure regulating station and their equipment at intervals not exceeding 15 months, but at least once each calendar year as required?* (MO.GMOPP.PRESSREGTEST.P) (detail)

192.605(b)(1) (192.739(a); 192.739(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**

Sec 10

**2. Pressure Telemetry or Recording Gauges (detail)** *Does the process require telemetry or recording gauges be utilized as required for distribution systems?* (MO.GMOPP.PRESSREGMETER.P) (detail)

192.605(b)(1) (192.741(a); 192.741(b); 192.741(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**

Sec 10 D

**3. Pressure Limiting and Regulating Stations Capacity of Relief Devices (detail)** *Does the process include procedures for ensuring, either by testing or a review of calculations, at intervals not exceeding 15 months, but at least once each calendar year, that the capacity of each pressure relief device at pressure limiting stations and pressure regulating stations has sufficient capacity, and for installing a new or additional device if a relief device is determined to have insufficient capacity?* (MO.GMOPP.PRESSREGCAP.P) (detail)

192.605(b)(1) (192.743(a); 192.743(b); 192.743(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 10

## Procedures - Valve and Vault Maintenance

**2. Valve Maintenance Distribution Lines (detail)** *Does the process include procedures for inspecting and partially operating each distribution system 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?* (MO.GM.DISTVALVEINSPECT.P) (detail)

192.605(b)(1) (192.747(a); 192.747(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 9 Covered task 13 and 14

## Procedures - Vault Inspection

**1. Vault Inspection (detail)** *Does the process provide adequate direction for inspecting vaults having a volumetric internal content of 200 cubic feet (5.66 cubic meters) or more that house pressure regulating/limiting equipment and are inspections to be performed at the required interval?* (FS.FG.VAULTINSPECTFAC.P) (detail)

192.605(b)(1) (192.749(a); 192.749(b); 192.749(c); 192.749(d))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Notes**  
No vaults

## Procedures - Prevention Of Accidental Ignition

**1. Prevention of Accidental Ignition (detail)** *Does the manual include procedures for minimizing the danger of accidental ignition where gas constitutes a hazard of fire or explosion?* (MO.GM.IGNITION.P) (detail)

192.605(b)(1) (192.751(a); 192.751(b); 192.751(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 14

## Procedures - Caulked Bell And Spigot Joints

**1. Bell and Spigot Joints (detail)** Does the process require that caulked bell and spigot joints be correctly sealed?  
(MO.GM.BELLSPIGOTJOINT.P) (detail)

192.753(a) (192.753(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Notes**  
No cast iron

## Procedures - Protecting Cast-Iron Pipeline

**1. Protecting Cast-Iron Pipeline (detail)** Does the process require adequate protection for segments of a buried cast-iron pipeline for which support has been disturbed? (MO.GM.CASTIRONPROTECT.P) (detail)

192.755(a) (192.755(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Notes**  
No cast iron

## Procedures - Welding And Weld Defect Repair/Removal

**1. Welding Procedures (detail)** Does the process require welding to be performed by qualified welders using qualified welding procedures and are welding procedures and qualifying tests required to be recorded in detail?  
(DC.WELDPROCEDURE.WELD.P) (detail)

192.225(a) (192.225(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 16

**\* 2. Qualification of Welders (detail)** Does the process require welders to be qualified in accordance with API 1104 or the ASME Boiler & Pressure Vessel Code? (TQ.QUOMCONST.WELDER.P) (detail)

192.227(a) (192.225(a); 192.225(b); 192.328(a); 192.328(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 16

**3. Qualification of Welders for Low Stress Pipe (detail)** Does the process require welders who perform welding on low stress pipe on lines that operate at < 20% SMYS to be qualified under Section I of Appendix C to Part 192, and are welders who perform welding on service line connection to a main required to be qualified under Section II of Appendix C to Part 192? (TQ.QUOMCONST.WELDERLOWSTRESS.P) (detail)

192.227(b) (192.225(a); 192.225(b); 192.805(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec c

PHMSA Form 2 Question Set (IA Equivalent)  
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

**4. Limitations on Welders (detail)** *Does the process require certain limitations be placed on welders?*  
(DC.WELDERQUAL.WELDERLIMITNDT.P) (detail)

192.303 (192.229(a); 192.229(b); 192.229(c); 192.229(d))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 5

**5. Welding Weather (detail)** *Does the process require welding to be protected from weather conditions that would impair the quality of the completed weld?* (DC.WELDPROCEDURE.WELDWEATHER.P) (detail)

192.303 (192.231)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec g

**6. Miter joints (detail)** *Does the process prohibit the use of certain miter joints?* (DC.WELDPROCEDURE.MITERJOINT.P) (detail)

192.303 (192.233(a); 192.233(b); 192.233(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec a

**7. Preparation for Welding (detail)** *Does the process require certain preparations for welding, in accordance with §192.235?* (DC.WELDPROCEDURE.WELDPREP.P) (detail)

192.303 (192.235)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec a

**8. Inspection and Test of Welds (detail)** *Does the process require visual inspections of welds to be conducted by qualified inspectors?* (DC.WELDINSPECTOR.WELDVISUALQUAL.P) (detail)

192.303 (192.241(a); 192.241(b); 192.241(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec h

**9. Repair or Removal of Weld Defects (detail)** *Does the process require welds that are unacceptable to be removed and/or repaired as specified by 192.245?* (DC.WELDINSPECTOR.WELDREPAIR.P) (detail)

192.303 (192.245(a); 192.245(b); 192.245(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec I



## Procedures - Nondestructive Testing

**1. Nondestructive Test and Interpretation Procedures (detail)** *Is there a process for nondestructive testing and interpretation?* (DC.WELDINSP.WELDNDT.P) (detail)

192.243(a) (192.243(b); 192.243(c); 192.243(d); 192.243(e).)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec h

## Procedures - Joining Of Pipeline Materials

**1. Plastic Pipe Joints (detail)** *Does the process require plastic pipe joints to be designed and installed in accordance with 192.281?* (DC.CO.PLASTICJOINT.P) (detail)

192.303 (192.273(b); 192.281(a); 192.281(b); 192.281(c); 192.281(d); 192.281(e))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec H CT-21

**2. Plastic pipe - Qualifying Joining Procedures (detail)** *Does the process require plastic pipe joining procedures to be qualified in accordance with §192.283, prior to making plastic pipe joints?* (DC.CO.PLASTICJOINTPROCEDURE.P) (detail)

192.273(b) (192.283(a); 192.283(b); 192.283(c); 192.283(d))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec H CT-21

**3. Plastic pipe - Qualifying Joining Procedures (detail)** *Is a process in place to ensure that personnel making joints in plastic pipelines are qualified?* (DC.CO.PLASTICJOINTQUAL.P) (detail)

192.285(d) (192.285(a); 192.285(b); 192.285(c); 192.805)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec H CT-21

**4. Qualification of Personnel Inspecting Joints in Plastic Pipelines (detail)** *Is a process in place to assure that persons who inspect joints in plastic pipes are qualified?* (DC.CO.PLASTICJOINTINSP.P) (detail)

192.287 (192.805(h))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec H CT-21

## Procedures - Corrosion Control

**1. Corrosion Control Personnel Qualification (detail)** Does the process require corrosion control procedures to be carried out by, or under the direction of, qualified personnel? (TQ.QU.CORROSION.P) (detail)

192.453 (192.805(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 8 A

**2. New Buried Pipe Coating (detail)** Does the process require that each buried or submerged pipeline installed after July 31, 1971, be protected against external corrosion with an adequate coating unless exempted by §192.455(b)? (TD.COAT.NEWPIPE.P) (detail)

192.605(b)(2) (192.455(a); 192.461; 192.463; 192.483(a))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 8 A

**3. Conversion to Service - Pipe Coating (detail)** Does the process require that each buried or submerged pipeline that has been converted to gas service and was installed after July 31, 1971, be protected against external corrosion with an adequate coating unless exempted by 192.455(b)? (TD.COAT.CONVERTPIPE.P) (detail)

192.605(b)(2) (192.452(a); 192.455(a); 192.455(b); 192.461(a))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 8

**4. Cathodic Protection post July 1971 (detail)** Does the process require that each buried or submerged pipeline installed after July 31, 1971, be protected against external corrosion with a cathodic protection system within 1 year after completion of construction, conversion to service, or becoming jurisdictional onshore gathering? (TD.CP.POST1971.P) (detail)

192.605(b)(2) (192.455(a); 192.457(a); 192.452(a); 192.452(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 8 A

**5. Use of Aluminum (detail)** Does the process give adequate guidance for the installation of aluminum in a submerged or buried pipeline? (TD.CP.ALUMINUM.P) (detail)

192.605(b)(2) (192.455(e))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Notes**  
Does not apply

PHMSA Form 2 Question Set (IA Equivalent)  
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

**6. Cathodic Protection pre August 1971 (detail)** Does the process require that pipelines installed before August 1, 1971 (except for cast and ductile iron lines) which are 1) bare or ineffectively coated transmission lines or 2) bare or coated pipes in compressor, regulator or meter stations must be cathodically protected in areas where active corrosion is found in accordance with Subpart I or Part 192? (TD.CP.PRE1971.P) (detail)

192.605(b)(2) (192.457(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 8

**7. Examination of Exposed Portions of Buried Pipe (detail)** Does the process require that exposed portions of buried pipeline must be examined for external corrosion? (TD.CPEXPOSED.EXPOSEINSPECT.P) (detail)

192.605(b)(2) (192.459)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 8 D

**8. Further Examination of Exposed Portions of Buried Pipe (detail)** Does the process require further examination of exposed buried pipe if corrosion is found? (TD.CPEXPOSED.EXPOSECORRODE.P) (detail)

192.605(b)(2) (192.459)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 8 D

**9. Cathodic Protection Monitoring Criteria (detail)** Does the process require CP monitoring criteria to be used that is acceptable? (TD.CPEXPOSED.MONITORCRITERIA.P) (detail)

192.605(b)(2) (192.463(a); 192.463(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 8 C

**10. Cathodic Protection of Amphoteric Metals (detail)** Does the process describe criteria to be used for cathodic protection of amphoteric metals (aluminum) that are included in a steel pipeline? (TD.CP.AMPHOTERIC.P) (detail)

192.605(b)(2) (192.463(b); 192.463(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Notes**  
Does not apply to operator

**11. Cathodic Protection Monitoring (detail)** Does the process adequately describe how to monitor CP that has been applied to pipelines? (TD.CPMONITOR.TEST.P) (detail)

192.605(b)(2) (192.465(a))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 8 C

PHMSA Form 2 Question Set (IA Equivalent)  
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

**12. Rectifiers or other Impressed Current Sources (detail)** *Does the process give sufficient details for making electrical checks of rectifiers or impressed current sources? (TD.CPMONITOR.CURRENTTEST.P) (detail)*

192.605(b)(2) (192.465(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 8 C

**13. Bonds, Diodes and Reverse Current Switches (detail)** *Does the process give sufficient details for making electrical checks of interference bonds, diodes, and reverse current switches? (TD.CPMONITOR.REVCURRENTTEST.P) (detail)*

192.605(b)(2) (192.465(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 8 C task 4

**14. Correction of Corrosion Control Deficiencies (detail)** *Does the process require that the operator correct any identified deficiencies in corrosion control? (TD.CPMONITOR.DEFICIENCY.P) (detail)*

192.605(b)(2) (192.465(d))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec C pg 3

**15. Unprotected Buried Pipelines (typically bare pipelines) (detail)** *Does the process give sufficient direction for the monitoring of external corrosion on buried pipelines that are not protected by cathodic protection? (TD.CP.UNPROTECT.P) (detail)*

192.605(b)(2) (192.465(e))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 8 C

**16. Isolation from Other Metallic Structures (detail)** *Does the process give adequate guidance for electrically isolating each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit? (TD.CP.ELECISOLATE.P) (detail)*

192.605(b)(2) (192.467(a); 192.467(b); 192.467(c); 192.467(d); 192.467(e))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 8 C

**17. Test Leads Installation (detail)** *Does the process provide adequate instructions for the installation of test leads? (TD.CPMONITOR.TESTLEAD.P) (detail)*

192.605(b)(2) (192.471(a); 192.471(b); 192.471(c); 192.469)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 8 C

PHMSA Form 2 Question Set (IA Equivalent)  
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

**18. Interference Currents (detail)** *Does the process give sufficient guidance and detail for identifying areas of potential stray current so the detrimental effects of stray currents can be minimized through a continuing program?* (TD.CPMONITOR.INTFRCURRENT.P) (detail)

192.605(b)(2) (192.473(a))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 8

**19. Internal Corrosion (detail)** *If the process does not preclude corrosive gas to be transported by pipeline, does the process also require that the corrosive effect of the gas on the pipeline be investigated and steps be taken to minimize internal corrosion?* (TD.ICP.CORRGAS.P) (detail)

192.605(b)(2) (192.475(a))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 8 F

**20. Internal Corrosion in Cutout Pipe (detail)** *Does the process direct personnel to examine removed pipe for evidence of internal corrosion?* (TD.ICP.EXAMINE.P) (detail)

192.605(b)(2) (192.475(a); 192.475(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 8 F

**21. Internal Corrosion Control: Design and Construction (192.476) (detail)** *Does the process require that the transmission line project has features incorporated into its design and construction to reduce the risk of internal corrosion, as required of §192.476?* (DC.DPC.INTCORRODE.P) (detail)

192.453 (192.476(a); 192.476(b); 192.476(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 8 F

**22. Internal Corrosion Corrosive Gas Actions (detail)** *Does the process give adequate direction for actions to be taken if corrosive gas is being transported by pipeline?* (TD.ICP.CORRGASACTION.P) (detail)

192.605(b)(2) (192.477)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 8 F

**23. Atmospheric Corrosion (detail)** *Does the process give adequate guidance for protecting above ground pipe from atmospheric corrosion?* (TD.ATM.ATMCORRODE.P) (detail)

192.605(b)(2) (192.479(a); 192.479(b); 192.479(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 8 E

PHMSA Form 2 Question Set (IA Equivalent)  
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

**24. Atmospheric Corrosion Monitoring (detail)** *Does the process give adequate instruction for the inspection of aboveground pipeline segments for atmospheric corrosion? (TD.ATM.ATMCORRODEINSP.P) (detail)*

192.605(b)(2) (192.481(a); 192.481(b); 192.481(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 8 E

**25. Repair of Corroded Pipe (detail)** *Does the process give sufficient guidance for personnel to repair or replace pipe that has corroded to an extent that there is no longer sufficient remaining strength in the pipe wall? (AR.RCOM.REPAIR.P) (detail)*

192.491(c) (192.485(a); 192.485(b); 192.487(a); 192.487(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 8

**26. Evaluation of Internally Corroded Pipe (detail)** *Does the process give sufficient guidance for personnel to evaluate the remaining strength of pipe that has been internally corroded? (TD.ICP.EVALUATE.P) (detail)*

192.605(b)(2) (192.485(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 8F

**27. Graphitization of Cast Iron and Ductile Iron (detail)** *Does the process give adequate guidance for remediation of graphitization of cast iron or ductile iron pipe? (TD.CP.GRAPHITIZE.P) (detail)*

192.605(b)(2) (192.489(a); 192.489(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Notes**  
No cast iron

**28. Corrosion Control Records (detail)** *Does the process include records requirements for the corrosion control activities listed in 192.491? (TD.CP.RECORDS.P) (detail)*

192.605(b)(2) (192.491(a); 192.491(b); 192.491(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec 8 G

## **Training and Qualification - Operator Qualification Plan & Records**

**1. Operator Qualification Plan and Covered Tasks (detail)** *Is there an OQ plan that includes covered tasks, and the basis used for identifying covered tasks?* (TQ.OQ.OQPLAN.P) (detail)

192.805(a) (192.801(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**

Plan completed by USDI

**2. Reevaluation Intervals for Covered Tasks (detail)** *Does the process establish and justify requirements for reevaluation intervals for each covered task?* (TQ.OQ.REEVALINTERVAL.P) (detail)

192.805(g)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**

Sec IX

**3. Contractors Adhering to OQ Plan (detail)** *Does the process require the OQ plan to be communicated to contractors and ensure that contractors are following the plan?* (TQ.OQ.OQPLANCONTRACTOR.P) (detail)

192.805(b) (192.805(f); 192.805(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**

Sec IX

**4. Contractor and Other Entity Qualification (detail)** *Does the process require contractor organizations or other entities that perform covered tasks on behalf of the operator to be qualified?* (TQ.OQ.OQCONTRACTOR.P) (detail)

192.805(b) (192.805(c); 192.855(d); 192.805(e); 192.805(f))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**

Sec IX

**6. Contractor and Other Entity Qualification (detail)** *Are adequate records maintained for contractor personnel qualifications that contain the required elements?* (TQ.OQ.OQCONTRACTOR.R) (detail)

192.807(a) (192.807(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**

Sec IX USDI

**7. Management of Other Entities Performing Covered Tasks (detail)** *Do records document evaluation of the other entity (ies) performing covered task(s) on behalf of the operator (e.g., through mutual assistance agreements) prior to performing task? (TQ.OQ.OTHERENTITY.R) (detail)*

192.805(b) (192.805(c); 192.803)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Usdi will perform tasks

**8. Evaluation Methods (detail)** *Are evaluation methods established and documented appropriate to each covered task? (TQ.OQ.EVALMETHOD.P) (detail)*

192.805(b) (192.803; 192.809(d); 192.809(e))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec E

**9. Evaluation Methods (detail)** *Do records indicate evaluation methods are documented for covered tasks and consistent with personnel qualification records? (TQ.OQ.EVALMETHOD.R) (detail)*

192.805(b) (192.803; 192.809(d); 192.809(e))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
USDI conducts OQ training with Energy World net material  
  
Computer test and hands on

**10. Abnormal Operating Conditions (detail)** *Does the process require: 1) individuals performing covered tasks be qualified to recognize and react to abnormal operating conditions (AOCs), 2) evaluation and qualification of individuals for their capability to recognize and react to AOCs, 3) AOCs identified as those that the individual may reasonably anticipate and appropriately react to during the performance of the covered task, and 4) established provisions for communicating AOCs for the purpose of qualifying individuals? (TQ.OQ.ABNORMAL.P) (detail)*

192.803

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Each Covered task lists has AOC

**11. Abnormal Operating Conditions (detail)** *Do records document evaluation of qualified individuals for recognition and reaction to AOCs? (TQ.OQ.ABNORMAL.R) (detail)*

192.807(a) (192.807(b); 192.803)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Verified during training



**12. Qualification Records for Personnel Performing Covered Tasks (detail)** *Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified? (TQ.OQ.RECORDS.R) (detail)*

192.807

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Bryan Allard  
  
Odor – 3-14-2026  
  
Locating – 2-22-2026  
  
Patrolling- 3-22-2026  
  
Rectifier- 1-20-2026  
  
Valves – 3-20-2026  
  
Pipe Joining stab fittings 2-16-2023

**13. Planning for Mergers and Acquisitions (Due Diligence re: Acquiring Qualified Individuals) (detail)** *Does the process adequately manage qualifications of individuals performing covered tasks during program integration following a merger or acquisition? (TQ.OQ.MERGERACQ.P) (detail)*

192.805(b) (192.803)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec D

**14. Training Requirements (Initial, Retraining, and Reevaluation) (detail)** *Does the OQ program provide for initial qualification, retraining and reevaluation of individuals performing covered tasks? (TQ.OQ.TRAINING.P) (detail)*

192.805(h)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec E, F

**15. Covered Task Performed by Non-Qualified Individual (detail)** *Are there provisions for non-qualified individuals to perform covered tasks while being directed and observed by a qualified individual, and are there restrictions and limitations placed on such activities? (TQ.OQ.NONQUALIFIED.P) (detail)*

192.805(c)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec G

**16. Personnel Performance Monitoring (detail)** *Does the program include provisions to evaluate an individual if there is reason to believe the individual is no longer qualified to perform a covered task based on: covered task performance by an individual contributed to an incident or accident; other factors affecting the performance of covered tasks?* (TQ.OQ.PERFMONITOR.P) (detail)

192.805(d) (192.805(e))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec H

**17. Program Performance and Improvement (detail)** *Does the process require evaluation of the OQ program and implementation of improvements to enhance the effectiveness of the program?* (TQ.OQ.PROGRAMEVAL.P) (detail)

192.605(a) (192.605(b)(8))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
Sec A

**18. Management of Changes (detail)** *Does the OQ program identify how changes to procedures, tools standards and other elements used by individuals in performing covered tasks are communicated to the individuals, including contractor individuals, and how these changes are implemented in the evaluation method(s)?* (TQ.OQ.MOC.P) (detail)

192.805(f)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
VII

**19. Notification of Significant Plan Changes (detail)** *Does the process require significant OQ program changes to be identified and the Administrator or State agency notified?* (TQ.OQ.CHANGENOTIFY.P) (detail)

192.805(i)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
VII Sec A

**DIMP Plan procedures and implementation**

**Operator and General Audit Information**

<b>Company:</b>	<b>Name: Drakesboro Natural Gas</b>		
	<b>Mailing and Official Address (If different): P.O. Box 129 Drakesboro, KY</b>		
	<b>Doing Business as or Affiliation:</b>		
<b>PHMSA Operator Identification (OPID) No.</b>	3538		
<b>Unit ID Number/ Unit Name inspected</b>			
<b>Address:</b>		<b>Lead Auditor or Inspector</b>	<b>Name: Melissa Holbrook</b>
			<b>Agency: KY PSC</b>
		<b>Date of Audit or Inspection:</b>	7-12-2023

***Company Representatives Participating***

Key Persons	Name/Title/Mailing Address	Phone/Email Address
<b>Primary Operator or Representative Interviewed or Providing Information</b>	Brian Jones – Superintendent	270-820-0019 drakesborogas@gmail.com
<b>Others Interviewed, Providing Information or Present at Audit or Inspection:</b>		

Contents

**Gas Distribution Integrity Management - Knowledge of the System**.....31  
**Gas Distribution Integrity Management - Identify Threats** .....31  
**Gas Distribution Integrity Management - GDIM Implementation**.....32  
**Reporting - Regulatory Reporting (Traditional)**.....44

## Gas Distribution Integrity Management - Knowledge of the System

**1. System Knowledge - Information Considered** *Do the procedures require the consideration of information gained from past design, operations, and maintenance (e.g., O&M activities, field surveys, One-Call system information, excavation damage, etc.)? (GDIM.RA.INFORMATION.P)*

192.1007(a)(2)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**  
Last plan update 6-8-2020  
After assessment with usdi plan needs to be updated with threats

## Gas Distribution Integrity Management - Identify Threats

**2. Identify Threats - Information Considered** *In identifying threats did the information considered include all of the required data and information sources? (GDIM.RA.INFOCONSIDERED.R)*

192.1007(b)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**  
Sec 5.1 and Sec 5.2

**4. Identify Threats - Threats Considered** *In identifying threats, do the procedures include consideration of all of the required threat categories to each gas distribution pipeline? (GDIM.RA.THREATCATEGORIES.P)*

192.1007(b)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Sec Notes**  
Sec 4

# Gas Distribution Integrity Management - GDIM Implementation

**1. Issues Identified in Previous Integrity Management Inspections** *Have all issues raised in previous DIMP inspections been satisfactorily addressed? (GDIM.QA.ISSUESIMPL.R)*

192.1005

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**  
Dimp plan was developed in 2020 after corrosion assessment of pipe needs to be updated with findings

**2. Identify Threats - Outside Sources** *Has the operator identified information or data from external sources (e.g. trade associations, operator's consultants, government agencies, other operators, manufacturers, etc.) that may require re-evaluation of threats and risks? (GDIM.RA.OUTSIDESOURCESIMPL.R)*

192.1007(b)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**  
PSC, KGA, USDI, APGA

**3. System Knowledge - Gaps** *Is missing or incomplete system information and data needed to fill knowledge gaps to assess existing and potential threats being collected? (GDIM.RA.GAPSIMPL.R)*

192.1007(a)(3)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**  
After 2023 assessment information needs to be updated

**4. System Knowledge - Information Needed (Systems)** *Is missing or incomplete system information and data using the procedures prescribed in the DIMP plan being collected? (GDIM.RA.SYSINFONEEDSIMPL.R)*

192.1007(a)(3)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**  
Information added as obtained

**5. System Knowledge - Information Needed (O&M)** *Has any new or missing information identified or acquired during normal operations, maintenance, and inspection activities been incorporated into the DIMP plan?* (GDIM.RA.OMINFONEEDSIMPL.R)

192.1007(a)(3)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**  
Information will be added at next evaluation

**6. System Knowledge - New Pipe Data** *Have required data on any new pipeline installations since August 2, 2011 been captured (e.g., location, wall thickness/SDR, manufacturer, lot/production number)?* (GDIM.RA.NEWPIPEIMPL.R)

192.1007(a)(5)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**  
Plan was developed in 2020

**7. System Knowledge - Data Collection Forms** *Are data collection forms used in conjunction with the operator's DIMP plan being fully and accurately completed?* (GDIM.RA.DATAFORMIMPL.R)

192.1007(a)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**

**8. System Knowledge - SME Input** *If Subject Matter Experts (SMEs), is their documented knowledge and experience being appropriately used in the DIMP Program?* (GDIM.RA.SMEIMPL.R)

192.1007(a)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**  
Russmar and USDI



**9. System Knowledge - Understanding** *Do operator personnel in the field understand their responsibilities under the DIMP plan? (GDIM.RA.DEMOUNDERSTANDINGIMPL.O)*

192.1007(a)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**

3 gas employees

**10. Identify Threats - Threats Considered (New Information)** *Has the operator acquired any new information relevant to system knowledge that may affect its threat identification? (GDIM.RA.THREATCATEGORIESIMPL.R)*

192.1007(b)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**

None since 2020 plan

**11. Identify Threats - Information Considered (Changes)** *Have any changes occurred that require re-evaluation of threats and risks? (GDIM.RA.INFOCONSIDEREDIMPL.R)*

192.1007(b)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**

No changes to threats since 2020 inspection

**12. Identify Threats - Implementation (Update)** *Since the last DIMP plan review by the regulatory agency, has the threat identification and risk assessment been updated based on newly acquired information or data relevant to system knowledge? (GDIM.RA.IMPLEMENTTHUPDATEIMPL.R)*

192.1007(c)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**

No issues identified

**13. Identify Threats - Implementation (DIMP Process)** *If the threat identification and risk evaluation and ranking have been modified, were the revisions made in accordance with the procedure in the DIMP plan?*  
(GDIM.RA.IMPLEMENTTHUPDATEPLANIMPL.R)

192.1007(c)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**

No changes at this time

**14. Rank Risk - System Subdivision (Adequacy)** *Does the current subdivision process (grouping of materials, geographic areas, etc.) adequately meet the need to properly evaluate and rank the existing and potential threats to the integrity of the system?* (GDIM.RA.SUBDIVIDEADEQIMPL.R)

192.1007(c)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**

Meets requirements

**15. Rank Risk - System Subdivision (Update)** *Have the system subdivisions within the risk evaluation and ranking been added to or modified since the last plan review by the regulatory agency?*  
(GDIM.RA.SUBDIVIDEUPDATEIMPL.R)

192.1007(c)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**

Meets requirements

**16. Rank Risk - System Subdivision (DIMP)** *If system subdivisions have been added or modified, was it done in accordance with the procedures described in the DIMP plan?* (GDIM.RA.SUBDIVIDEDIMPIMPL.R)

192.1007(c)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**

No issues

**17. Rank Risk - System Subdivision (Result)** *If system subdivisions have been added or modified, did the new system subdivision result in modifications to the risk evaluation and ranking? (GDIM.RA.SUBDIVIDERESULTIMPL.R)*  
192.1007(c)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**  
No changes

**18. Measures to Reduce Risk - Implementation (Update)** *Does documentation reviewed demonstrate that measures to reduce risks per the DIMP plan are being implemented? (GDIM.PM.IMPLEMENTPMIMPL.R)*  
192.1007(d)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**  
Leak and cp records reviewed no issues

**19. Measures to Reduce Risk - Implementation (Completion)** *Have any measures to reduce risks resulting in the elimination/mitigation of the associated identified threat been completed (e.g., pipe replacement program completed, etc.)? (GDIM.PM.IMPLEMENTPMCOMPLETEIMPL.R)*  
192.1007(d)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**  
Leak survey completed annually

**20. Measures to Reduce Risk - Implementation (Re-Evaluate)** *Have risks been re-evaluated and re-ranked because of the elimination/mitigation of an identified threat? (GDIM.PM.IMPLEMENTPMREEVALIMPL.R)*  
192.1007(d)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

**Notes**  
Reevaluation not due at this year an no changes  
Will need to be conducted after corrosion assessment of pipe completed

**21. Measures to Reduce Risk - Implementation (Specific Risk)** *Does each implemented risk reduction measure identified in the DIMP plan address a specific risk or group of risks?* (GDIM.PM.IMPLEMENTPMSPECIFRISKIMPL.R)  
192.1007(d)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**

**22. Measures to Reduce Risk - Leak Management** *Can the operator provide documentation to demonstrate that an effective leak management program is being implemented (answer "N/A" if all leaks are repaired when found)?* (GDIM.PM.LEAKMANAGEMENTIMPL.R)  
192.1007(d)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**

Annual leak survey completed and leaks being repaired

**23. Measure Performance - Implementation (Data)** *Is data being collected for the required performance measures in 192.1007(e)?* (GDIM.QA.IMPLEMENTEVDATAIMPL.R)  
192.1007(e)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**

**24. Measure Performance - Implementation (DIMP)** *Based on field observations and/or record reviews, is the data used to measure performance being accurately collected in accordance with the procedures in its DIMP plan?* (GDIM.QA.IMPLEMENTEVDATADIMPIMPL.R)  
192.1007(e)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**

**25. Measure Performance - Implementation (Baseline)** *Is each performance measure being monitored from an established baseline?* (GDIM.QA.IMPLEMENTEVBASELINEIMPL.R)

192.1007(e)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**  
 No additional performance measures required

**26. Measure Performance - Implementation (Specific Risk)** *Is each performance measure added since the DIMP plan was last updated tied to a specific risk reduction measure or group of measures?* (GDIM.QA.IMPLEMENTEVRIKIMPL.R)

192.1007(e)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**  
 No additional performance measures required

**27. Periodic Evaluation - Implementation (Frequency)** *Have periodic evaluations of the DIMP plan been performed on the frequency specified in the plan? [If a periodic evaluation has not been required since plan implementation or the last inspection, mark questions 27-32 as "N/A".]* (GDIM.CA.PERIODICEVALFREQIMPL.R)

192.1007(f)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

**Notes**  
 Periodic evaluation not due at this time

**28. Periodic Evaluation - Implementation (Requirements)** *Did the periodic evaluation include all required elements?* (GDIM.CA.PERIODICEVALREQTSIMPL.R)  
 192.1007(f)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

**Notes**

Periodic evaluation not due at this time

**29. Periodic Evaluation - Implementation (High Risk)** *If any established performance measures indicated an increase in risk beyond an acceptable level (as established in the DIMP plan), were new risk reduction measures implemented along with their associated performance measures?* (GDIM.CA.PERIODICEVALHIRISKIMPL.R)  
 192.1007(f) (192.1007(e))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

**Notes**

Periodic evaluation not due at this time

**30. Periodic Evaluation - Implementation (Risk Reduction Measures)** *If the periodic evaluation indicates that implemented measures to reduce risks are NOT effective, were risk reduction measures modified, deleted or added?* (GDIM.CA.PERIODICEVALRISKREDIMPL.R)  
 192.1007(f)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

**Notes**

Periodic evaluation not due at this time

**31. Periodic Evaluation - Implementation (Performance Measures)** *Did the periodic evaluation indicate that the selected performance measures are assessing the effectiveness of risk reduction measures, and, if not, were performance measures modified, deleted or added?* (GDIM.CA.PERIODICEVALPRFMESIMPL.R)

192.1007(f)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Notes**

Periodic evaluation not due at this time

**32. Periodic Evaluation - Implementation (DIMP Plan)** *Were procedures followed in conducting periodic evaluations and program improvements?* (GDIM.CA.PERIODICEVALDIMPIMPL.R)

192.1007(f)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Notes**

Periodic evaluation not due at this time

**33. Report Results - Submittal** *Were Parts C and D of the PHMSA Distribution Annual Report (Form 7100.1-1) completed in the submission to PHMSA and the state regulatory authority having jurisdiction, if required, for each year since the last inspection?* (GDIM.RR.SUBMITREPORTSIMPL.R)

192.1007(g)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**

2022 has been submitted due to personal changes 2023 has not been submitted at time of inspection

**34. Mechanical Fitting Failures - Information Collection (Data)** *Have accurate records been maintained documenting mechanical fitting failures that resulted in hazardous leaks?*  
(GDIM.RR.MECHANICALFITTINGDATAIMPL.R)  
192.1009 (191.12)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**

**35. Mechanical Fitting Failures - Information Collection (Reporting)** *Did the operator report all mechanical fitting failures that resulted in a hazardous leak for the previous calendar year to PHMSA and State authorities, as appropriate, by March 15th of the next calendar year, and did the reports contain the information required by Department of Transportation Form PHMSA F-7100.1-2?* (GDIM.RR.MECHANICALFITTINGRPTIMPL.R)  
192.1009 (191.12)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**

**36. Mechanical Fitting Failures - Information Collection (DIMP)** *Were procedure(s) followed for collecting the appropriate information and submitting PHMSA Form F-7100.1-2?*  
(GDIM.RR.MECHANICALFITTINGDIMPIMPL.O)  
192.1009 (191.12)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**

**37. Records - Implementation** *Are records retained demonstrating compliance with Subpart P, as specified in its DIMP plan, for 10 years (or since 08/02/2011)?* (GDIM.QA.RECORDREQUIREMENTSIMPL.R)  
192.1011

Sat+	Sat	Concern	Unsat	NA	NC
				X	

**Notes**

Plan was implemented in 2020



**38. Records - Implementation (Plan Retention)** *Were copies of superseded DIMP plans retained for 10 years (or since 08/02/2011)?* (GDIM.QA.RECORDREQTSRETAINIMPL.R)

192.1011

Sat+	Sat	Concern	Unsat	NA	NC
				X	

**Notes**

Plan was implemented in 2020

**39. Records - Implementation (DIMP)** *Were DIMP procedures followed as applicable to records retention?* (GDIM.QA.RECORDREQTSDIMPIMPL.R)

192.1011

Sat+	Sat	Concern	Unsat	NA	NC
X					

**Notes**

**40. Deviation from Periodic Inspections - Approval** *Has approval been requested or received from PHMSA or the appropriate State Regulatory Authority for alternate (less strict than code) periodic inspection intervals? [If no, mark Subgroup GDIM.IMPL questions 40-44 "N/A".]* (GDIM.PI.PERIODICINSPDEVAPPRVIMPL.R)

192.1013(c)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

**Notes**

Does not apply

**41. Deviation from Periodic Inspections - Implementation** *Have the periodic inspections been implemented and have they been conducted at the specified (approved) alternate intervals?* (GDIM.PI.PERIODICINSPDEVPERFRMIMPL.R)

192.1013(c)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

**Notes**

Does not apply

**42. Deviation from Periodic Inspections - Requirements or Conditions** *Have all conditions been complied with that were required as part of the alternate inspection interval approval?*  
 (GDIM.PI.PERIODICINSPDEVREQTIMPL.R)  
 192.1013(c)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

**Notes**  
 Does not apply

**43. Deviation from Periodic Inspections - Performance Measures** *Do performance measure records indicate that deviation inspection resources were assigned to higher risk threat(s) and/or that that decreased inspection intervals contributed to an equal or greater overall level of safety has been achieved since the alternate inspection frequency was implemented?* (GDIM.PI.PERIODICINSPDEVPRFMESIMPL.R)  
 192.1013(c)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

**Notes**  
 Does not apply

**44. Deviation from Periodic Inspections - Corrective Action** *If that an equal or greater overall level of safety has not been achieved, has corrective action been taken?* (GDIM.PI.PERIODICINSPDEVACTIONIMPL.R)  
 192.1013(c)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

**Notes**  
 Does not apply

## Reporting - Regulatory Reporting (Traditional)

**5. Mechanical Fitting Failures - Information Collection (Data)** *Have accurate records been maintained documenting mechanical fitting failures that resulted in hazardous leaks?*  
(GDIM.RR.MECHANICALFITTINGDATAIMPL.R)

192.1009 (191.12)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**

## NTSB Questions and Advisory Bulletins

SUPPLEMENTAL INSPECTION QUESTIONS	Yes	No	N/A	N/C
Does the operator have procedures for determining if exposed cast iron pipe was examined for evidence of graphitization?			x	
If necessary, was remedial action taken?			x	
Comments: no cast iron				
Does the operator have procedures for surveillance of cast iron pipelines?			x	
Was appropriate action taken resulting from tracking circumferential cracking failures, study of failures, study of leakage history, or other unusual operating maintenance condition? (See GPTC Appendix G-18 for guidance)			x	
Comments: no cast iron				
Does the operator have emergency response procedures for leaks caused by excavation damage near buildings?		x		
Do procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings (Refer to 4/12/01 letter from PHMSA)		x		
Comments: manual does not specify procedures				
Does the operator's records of previous accidents and failures (including reported third party damage and leak response) ensure appropriate operator response as required by 192.617.	x			
Comments: Leaks reviewed				

## THIRD PARTY/EXCAVATION DAMAGE PREVENTION SUPPLEMENTAL QUESTIONS

SUPPLEMENTAL INSPECTION QUESTIONS	Yes	No	N/A	N/C
Does the operator or its contractors have directional drilling/ boring procedures?	x			
Do the procedures include actions to protect their facilities from the dangers posed by drilling and other trenchless technologies?	x			
Comments: Covered Task 29				
Is operator following written procedures pertaining to notification of excavation, marking, positive response, and the availability and use of the one-call system?	x			
Comments: DPP plan				
Has operator adopted the CGA Best Practices document as a means of reducing damages to all underground facilities? If no, encourage and promote the adoption of CGA Best Practices document.		x		

Comments: Recommended to adopt cga best practices copy will be mailed				
Do the operator's records of accidents and failures due to excavation damage ensure causes of failure are addressed to minimize the possibility of recurrence as required by 192.617?	x			
Comments: no issues identified				

<b>PLASTIC PIPE DEFECTS/LEAKS</b>				
<b>SUPPLEMENTAL INSPECTION QUESTIONS</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>	<b>N/C</b>
Has operator identified any plastic pipe and /or components that have shown a record of defects/leaks? If yes, what is operator doing to mitigate the safety concerns?		x		
Comments: no issues identified				

<b>PERMALOCK MECHANICAL TAPPING TEE ASSEMBLIES</b>				
<b>SUPPLEMENTAL INSPECTION QUESTIONS</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>	<b>N/C</b>
Does the operator use PermaLock Mechanical Tapping Tee Assemblies? If yes, are they experience any issues with these type of installations?			x	
Comments: operator does not use in system				
Are they using best practices recommended by the manufacturer in their O&M Manual and/or distribution integrity management programs?			x	
Comments: operator does not use in system				
Are they using the specified tools and methods to correctly install these Assemblies?			x	
Comments: operator does not use in system				

<b>OPERATOR PROCEDURES FOR CONSIDERING LOW PRESSURE SYSTEMS IN THREAT ANALYSIS</b>				
<b>SUPPLEMENTAL INSPECTION QUESTIONS</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>	<b>N/C</b>
Does the operator include low pressure systems in DIMP Plan?			x	
Comments: no low pressure				
Does the operator have procedures for considering low pressure distribution systems in threat analysis?			x	
Comments: no low pressure				

**DISTRIBUTION- INDOOR METER SETS WITH REGULATORS**

SUPPLEMENTAL INSPECTION QUESTIONS	Yes	No	N/A	N/C
Does the operator have any meters /and or service regulators inside buildings? If so, do they have an action plan to relocate the equipment outside of the building? Recommend installing methane detectors inside buildings. NTSB (Silver Spring, MD Incident)			x	
Comments: no meters in building				

**Advisory Bulletins [Docket No. PHMSA-2022-0063]**

SUPPLEMENTAL INSPECTION QUESTIONS	Yes	No	N/A	N/C
<b>Have all natural gas operators reviewed and responded to Potential for Damage to Pipeline Facilities Caused by Earth Movement and Other Geological Hazards. SUMMARY:</b> PHMSA is issuing this updated advisory bulletin to remind owners and operators of gas and hazardous liquid pipelines, including supercritical carbon dioxide pipelines, of the potential for damage to those pipeline facilities caused by earth movement in variable, steep, and rugged terrain and terrain with varied or changing subsurface geological conditions. Additionally, changing weather patterns due to climate change, including increased rainfall and higher temperatures, may impact soil stability in areas that have historically been stable. These phenomena can pose a threat to the integrity of pipeline facilities if those threats are not identified and mitigated. Owners and operators should consider monitoring geological and environmental conditions, including changing weather patterns, in proximity to their facilities.			x	
Comments: no issues identified				

## CYBERSECURITY QUESTIONNAIRE

49 CFR 192.605 Procedural manual for operations, maintenance, and emergencies.  
 807 KAR 5:022 Section 13(7) Continuing surveillance of operational systems.

**1.** Does the operator utilize any business or operational systems which may be vulnerable to cybersecurity concerns?

Yes	No	NA	NC
	x		

**Notes**

No issues

**2.** Has the operator developed and implemented a cybersecurity written plan that includes assessing and mitigating vulnerabilities for critical infrastructure and essential business systems? Describe.

Yes	No	NA	NC
	x		

**Notes**

**3.** Has the operator utilized any internal or external resources and/or personnel assigned specifically with accessing and/or analyzing cybersecurity threats and vulnerabilities? Describe.

Yes	No	NA	NC
	x		

**Notes**

No issues

**4.** Are cybersecurity threats considered as part of the operator's overall operations and maintenance plans?

Yes	No	NA	NC
	x		

**Notes**

No issues

**5.** Has the operator experienced any cyber-attacks related to its business or operational systems? Describe.

Yes	No	NA	NC
	x		

No issues

**Notes**

**6.** Identify personnel with specific responsibilities for cybersecurity within your organization?

Yes	No	NA	NC
	x		

**Notes**

# Public Awareness Program Effectiveness

## Plan and Records Review

<b>1. Public Education Program (detail)</b> <i>Has the continuing public education (awareness) program been established as required?</i> (PD.PA.PROGRAM.P) (detail)						
192.616(a) (192.616(h))	Sat+	Sat	Concern	Unsat	NA	NC
		X				
<b>Notes</b> Plan reviewed						

<b>2. Management Support of Public Awareness Program (detail)</b> <i>Does the operator's program documentation demonstrate management support?</i> (PD.PA.MGMTSUPPORT.P) (detail)						
192.616(a) (API RP 1162 Section 2.5; API RP 1162 Section 7.1)	Sat+	Sat	Concern	Unsat	NA	NC
		X				
<b>Notes</b> Pg 2						

<b>3. Asset Identification (detail)</b> <i>Does the program clearly identify the specific pipeline systems and facilities to be included in the program, along with the unique attributes and characteristics of each?</i> (PD.PA.ASSETS.P) (detail)						
192.616(b) (API RP 1162 Section 2.7 Step 4)	Sat+	Sat	Concern	Unsat	NA	NC
		X				
<b>Notes</b> Sec 2 pg 3						

<b>4. Audience Identification (detail)</b> <i>Does the program establish methods to identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents?</i> (PD.PA.AUDIENCEID.P) (detail)						
192.616(d) (192.616(e); 192.616(f); API RP 1162 Section 2.2; API RP 1162 Section 3)	Sat+	Sat	Concern	Unsat	NA	NC
		X				
<b>Notes</b> Sec 3						



**5. Audience Identification Records (detail)** Do records identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents to which it sends public awareness materials and messages? (PD.PA.AUDIENCEID.R) (detail)

192.616(d) (192.616(e); 192.616(f); API RP 1162 Section 2.2; API RP 1162 Section 3)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

**Notes**

Records reviewed no issues

**6. Messages, Delivery Methods, and Frequencies (detail)** Does the program define the combination of messages, delivery methods, and delivery frequencies to comprehensively reach all affected stakeholder audiences in all areas where gas is transported? (PD.PA.MESSAGES.P) (detail)

192.616(c) (API RP 1162 Section 3; API RP 1162 Section 4; API RP 1162 Section 5)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

**Notes**

2022 mailings sent by drakesboro  
2023 USDI is working with Paradigm to conduct mailings

**7. Consideration of Supplemental Enhancements (detail)** Were relevant factors considered to determine the need for supplemental public awareness program enhancements for each stakeholder audience, as described in API RP 1162? (PD.PA.SUPPLEMENTAL.P) (detail)

192.616(c) (API RP 1162 Section 6.2)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

**Notes**

Sec 4

**8. Educational Provisions (detail)** Did delivered messages specifically include provisions to educate the public, emergency officials, local public officials, and excavators on: (1) Use of a one-call notification system prior to excavation and other damage prevention activities; (2) Possible hazards associated with unintended releases from a gas pipeline facility; (3) Physical indications of a possible release; (4) Steps to be taken for public safety in the event of a gas pipeline release; and (5) Procedures to report such an event? (PD.PA.EDUCATE.R) (detail)

192.616(d) (192.616(f))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

**Notes**

Message reviewed and meets requirements

**9. Messages on Pipeline Facility Locations (detail)** *Were messages developed and delivered to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations?* (PD.PA.LOCATIONMESSAGE.R) (detail)

192.616(e) (192.616(f))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

**Notes**  
 2023 messages will be takeover by usdi and paradigm  
 2022 messages sent as required

**10. Baseline Message Delivery Frequency (detail)** *Did the delivery of materials and messages meet or exceed the baseline delivery frequencies specified in API RP 1162, Table 2-1 through Table 2.3?* (PD.PA.MESSAGEFREQUENCY.R) (detail)

192.616(c) (API RP 1162 Table 2-1; API RP 1162 Table 2-2; API RP 1162 Table 2-3)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

**Notes**  
 2023 messages will be takeover by usdi and paradigm  
 2022 messages sent as required

**11. Liaison with Public Officials (detail)** (presented above) *Do records indicate liaisons established and maintained with appropriate fire, police and other public officials and utility owners in accordance with procedures?* (EP.ERG.LIAISON.R) (detail)

192.605(a) (192.615(c)(1); 192.615(c)(2); 192.615(c)(3); 192.615(c)(4); 192.616(c); ADB-05-03)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

**Notes**  
 2023 messages will be takeover by usdi and paradigm  
 2022 messages sent as required

**12. Other Languages (detail)** *Does the program require that materials and messages be provided in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?* (PD.PA.LANGUAGE.P) (detail)

192.616(g) (API RP 1162 Section 2.3.1)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

**Notes**  
 Sec 5

**13. Other Languages (detail)** (presented above) *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?* (PD.PA.LANGUAGE.R) (detail)

192.616(g) (API RP 1162 Section 2.3.1)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

**Notes**  
Sec 5

**14. Evaluation Plan (detail)** *Does the program include a process that specifies how program implementation and effectiveness will be periodically evaluated?* (PD.PA.EVALPLAN.P) (detail)

192.616(i) (192.616(c); API RP 1162 Section 8; API RP 1162 Appendix E)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

**Notes**  
Sec 8

**15. Evaluate Program Implementation (detail)** *Has an audit or review of the operator's program implementation been performed annually since the program was developed?* (PD.PA.EVALIMPL.R) (detail)

192.616(c) (192.616(i); API RP 1162 Section 8.3)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

**Notes**  
Sec 6

**16. Acceptable Methods for Program Implementation Audits (detail)** *Was one or more of the three acceptable methods (i.e., internal assessment, 3rd-party contractor review, or regulatory inspections) used to complete the annual audit or review of program implementation?* (PD.PA.AUDITMETHODS.R) (detail)

192.616(c) (192.616(i); API RP 1162 Section 8.3)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

**Notes**  
Sec 6 psc inspection

**17. Program Changes and Improvements (detail)** *Were changes made to improve the program and/or the implementation process based on the results and findings of the annual audit(s)?* (PD.PA.PROGRAMIMPROVE.R) (detail)

192.616(c) (API RP 1162 Section 8.3)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

**Notes**  
2023 USDI complementing new plan and taking over mailings and surveys

**18. Evaluating Program Effectiveness (detail)** (presented above) *Have effectiveness evaluation(s) of the program been performed for all stakeholder groups in all notification areas along all systems covered by the program?* (PD.PA.EVALEFFECTIVENESS.R) (detail)

192.616(c) (API RP 1162 Section 8.4)	Sat+	Sat	Concern	Unsat	NA	NC
					X	

**Notes**  
Evaluation not due this year

**19. Measure Program Outreach (detail)** *In evaluating effectiveness, was actual program outreach for each stakeholder audience tracked?* (PD.PA.MEASUREOUTREACH.R) (detail)

192.616(c) (API RP 1162 Section 8.4.1)	Sat+	Sat	Concern	Unsat	NA	NC
					X	

**Notes**  
Evaluation not due this year

**20. Measure Understandability of Message Content (detail)** *In evaluating program effectiveness, was the percentage of each stakeholder audience that understood and retained the key information from the messages determined?* (PD.PA.MEASUREUNDERSTANDABILITY.R) (detail)

192.616(c) (API RP 1162 Section 8.4.2)	Sat+	Sat	Concern	Unsat	NA	NC
					X	

**Notes**  
Evaluation not due this year

**21. Measure Desired Stakeholder Behavior (detail)** *In evaluating program effectiveness, was evaluation made of whether appropriate preventive, response, and mitigative behaviors were understood and likely to be exhibited?* (PD.PA.MEASUREBEHAVIOR.R) (detail)

192.616(c) (API RP 1162 Section 8.4.3)	Sat+	Sat	Concern	Unsat	NA	NC
					X	

**Notes**  
Evaluation not due this year

<b>22. Measure Bottom-Line Results (detail)</b> <i>Were bottom-line results of the program measured by tracking third-party incidents and consequences including: (1) near misses, (2) excavation damages resulting in pipeline failures, (3) excavation damages that do not result in pipeline failures? (PD.PA.MEASUREBOTTOM.R) (detail)</i>						
192.616(c) (API RP 1162 Section 8.4.4)	Sat+	Sat	Concern	Unsat	NA	NC
					X	
<b>Notes</b> Evaluation not due this year						

<b>23. Program Changes (detail)</b> <i>Were needed changes and/or modifications to the program identified and documented based on the results and findings of the program effectiveness evaluations? (PD.PA.CHANGES.R) (detail)</i>						
192.616(c) (API RP 1162 Section 2.7 (Step 12); API RP 1162 Section 8.5)	Sat+	Sat	Concern	Unsat	NA	NC
		X				
<b>Notes</b> usdi will be conducting public awareness and mailings with paradigm in 2023						

## Drug and Alcohol Plan and Records - General Program Requirements

Operator Profile	
Company Name	Drakesboro Natural Gas
Doing Business As (DBA) (if applicable)	
Operator Identification Number (OPID)	3538
List all other OPIDs covered under this Substance Abuse Program (if any)	
Mailing Address	P.O. Box 129 Drakesboro, KY 42337
Official Address (if different)	

Regulated Facility Type (check-off all that apply)			
<input type="checkbox"/>	Gas Transmission Pipeline	<input type="checkbox"/>	Hazardous Liquid Pipeline
<input checked="" type="checkbox"/>	Gas Distribution Pipeline	<input type="checkbox"/>	Carbon Dioxide Pipeline
<input type="checkbox"/>	Gas Gathering Pipeline	<input type="checkbox"/>	Liquefied Natural Gas (LNG) Facility

<b>DER or Substance Abuse Program Manager</b>			
Name		Email	
Title		Phone	
Mailing Address		Cell	

<b>Consortium or Third-Party Administrator (C/TPA)</b>			
Company		Web or Email	
Mailing Address			Phone
<b>C/TPA Point of Contact</b>			
Name		Email	
Mailing Address		Phone	
		Cell	

**Written Anti-Drug Plan and Alcohol Misuse Plan**

PHMSA regulated pipeline operators must have a written Anti-Drug Plan and a written Alcohol Misuse Plan to conduct drug and alcohol (D&A) tests in accordance with PHMSA’s Drug & Alcohol Testing regulations in Part 199 and the DOT’s Procedures for Transportation Workplace Drug and Alcohol Testing programs in Part 40. However, PHMSA allows operators to have one combined written D&A Plan.

- The operator has a written PHMSA Anti-Drug Plan [§199.101]
- The operator has a written PHMSA Alcohol Misuse Plan [§199.202]
- The operator has a combined written PHMSA Anti-Drug and Alcohol Misuse Plan

Note: Operators may have a written plan that covers more than one DOT agency. If so, the plan must be inspected for all required PHMSA items while non-PHMSA items should not be inspected by PHMSA inspectors.

**Documents Reviewed During Inspection**

Document Number	Rev	Date	Document Title
	6-2023		KLC Drug plan

# Drug and Alcohol - General Program Requirements

**1. Designated Employer Representative (DER)** *Has the operator appointed a company employee as the Designated Employer Representative (DER)?* (DA.GENERAL.DER.R)  
40.3 (40.15(d);40.355(k))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**  
Pg 14 II. Sec B

**2. Operator Oversight of Service Agents** *Does the process ensure the operator remains responsible for the actions of all its service agents, including a Consortium/Third Party Administrator (C/TPA)?* (DA.GENERAL.SERVICEAGENTOVERSIGHT.P)  
40.11(b) (40.11(c);40.15(c);40.341(a);40.355(a);40.355(m);40.355(n))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**  
Pg 15 sec F

**3. Covered Employees** *Does the process result in the proper and complete identification of covered employees and the exclusion of non-covered employees?* (DA.GENERAL.COVEREDEMPLOYEES.P)  
199.3 (199.1;40.347(b)(2))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**  
pg 14 II A. and non-covered – Pg 15 C



**4. Previous Employer DOT D&A Record Checks** *Does the process include previous employer DOT D&A record checks for employees seeking to perform covered functions for the first time (i.e., a new hire or an employee transferring into a safety-sensitive position)?* (DA.GENERAL.PREVIOUSEMPLOYERRECORDS.P) 40.25(a) (40.25(b);40.25(c);40.25(d);40.25(e);40.25(f);40.25(g);40.27;40.321(b);40.351(d))

Sat+	Sat	Concern	Unsat	NA	NC

**Notes**  
Pg 16 sec A 1.

**5. DOT vs. Non-DOT D&A Tests** *Does the process separate and prioritize DOT drug and alcohol testing over all non-DOT drug and alcohol testing?* (DA.GENERAL.NONDOTTESTS.P) 40.13(a) (40.13(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
II. C. pg 11  
  
Non-IV. C pg31 and pg 25

**6. Operator Oversight of Contractor D&A Programs** *If a contractor performs covered functions on the pipeline and is allowed to have its own D&A Programs, does the process ensure the contractor fully complies with Parts 199 and 40?* (DA.GENERAL.CONTRACTOROVERSIGHT.P) 199.115 (199.115(a);199.115(b);199.245(a);199.245(b);199.245(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
  
II. E. pg 12

**7. Reporting of Annual D&A Test Results to PHMSA** *Does the process ensure D&A MIS reports are submitted annually to PHMSA as required? (DA.GENERAL.MISREPORTS.P)*  
 199.119(a) (199.3;199.119(f);199.229(a);199.229(d);40.26)

Sat+	Sat	Concern	Unsat	NA	NC

**Notes**  
 Appendix K

## Drug and Alcohol - Anti-Drug Program

**1. Written Anti-Drug Plan** *Is a written Anti-Drug Plan in-place and maintained that conforms to the requirements of Part 199 and Part 40? (DA.DRUG.PLAN.P)*  
 199.101(a) (199.101(a)(1);199.101(a)(2);199.101(a)(3);199.101(a)(4))

Sat+	Sat	Concern	Unsat	NA	NC

**Notes**  
 I pg 8

**2. Qualification Requirements** *Do records indicate that Anti-Drug program positions and/or service agents meet the applicable qualification requirements of Part 40 and Part 199? (DA.DRUG.SERVICEAGENTQUAL.R)*  
 199.5 (199.107(a);199.109(b);40.33;40.81(a);40.121;40.281)

Sat+	Sat	Concern	Unsat	NA	NC
					X

**Notes**  
 No testing conducted for 2023

**3. Prohibited Drugs** Does the process require that DOT drug tests are only conducted for the "prohibited drugs" specified in Part 40? (DA.DRUG.PROHIBITEDDRUGS.P)  
199.3 (40.3)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**  
Appendix N

**4. Pre-Employment Drug Testing** Does the process require that no individual is allowed to perform a covered function unless that individual passes a drug test or is covered by an anti-drug program that conforms to Part 199? (DA.DRUG.PREEMPLOYMENT.P)  
199.105(a) (199.105(c)(5))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**  
III.A. pg 12

**5. Post-Accident Drug Testing** Does the process ensure that post-accident drug testing is conducted as required? (DA.DRUG.POSTACCIDENT.P)  
199.105(b) (199.117(a)(5);40.355(g);40.355(h))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**  
III. B pg 14

**6. Random Drug Testing** Does the process ensure that random drug testing is conducted as required? (DA.DRUG.RANDOM.P)  
199.105(c)(5) (199.105(c)(6);199.105(c)(7);199.105(c)(8);199.105(c)(9))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**  
III. C. pg 17

**7. Reasonable Cause Drug Testing** *Does the process ensure that reasonable cause drug testing is conducted as required?* (DA.DRUG.REASONABLECAUSE.P)  
 199.105(d) (199.117(a)(3);40.355(g);40.355(h))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**  
 III. D. pg 18

**8. Return-to-Duty Drug Testing** *Does the process ensure that return-to-duty drug testing is conducted as required?* (DA.DRUG.RETURN TODUTY.P)  
 199.105(e) (Part 40 Subpart O;40.67(b);40.285(a);40.289(b);40.305(a))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**  
 III. E. pg 18

**9. Follow-Up Drug Testing** *Does the process ensure that follow-up drug testing is conducted as required?* (DA.DRUG.FOLLOWUPTTEST.P)  
 199.105(f) (40.67(b);40.307;40.309)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**  
 III. F. pg 18

**10. Medical Review Officer (MRO) Duties** *Does the process ensure the MRO performs functions as required by DOT Procedures?* (DA.DRUG.MRODUTIES.P)  
 199.109(c) (199.109(a);40.123(a);40.123(b);40.123(c);40.123(e);40.123(f);40.123(g);Part 40 Subpart G)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**  
 J. pg 23 and appendix F

**11. MRO Drug Test Reports to the Operator** *Does the process ensure the MRO reports all drug test results to the DER as required? (DA.DRUG.MROTESTREPORTS.P)*

199.109(d) (Part 40 Subpart G;40.345(a);40.345(b);40.345(c);40.355(b);40.355(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**

J. pg 23

**12. Employee Stand-Down and Removal From Covered Functions** *Does the process ensure an employee is immediately removed from performing covered functions after failing or refusing a drug test? (DA.DRUG.STANDOWNREMOVAL.P)*

199.103(a) (199.7(a);40.21(a);40.21(b);40.23(a);40.23(b);40.23(d);40.287)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**

Sec R pg 40

**13. Employee Assistance Program (EAP)** *Does the process ensure that an EAP is established and available to employees and supervisory personnel? (DA.DRUG.EAP.P)*

199.113(a) (199.113(b);199.113(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**

III. P pg 24 and appendix I

# Drug and Alcohol - Alcohol Misuse Prevention Program

**1. Written Alcohol Misuse Plan** *Is a written Alcohol Misuse Plan in-place and maintained that conforms to the requirements of Part 199 and Part 40? (DA.ALCOHOL.PLAN.P)*

199.202

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**  
IV pg 25

**2. Qualification Requirements** *Do records indicate that Alcohol Misuse Prevention Program positions and/or service agents meet the applicable qualification requirements of Part 40 and Part 199? (DA.ALCOHOL.SERVICEAGENTQUAL.R)*

199.5 (40.213)

Sat+	Sat	Concern	Unsat	NA	NC
					X

**Notes**  
No tests have been conducted for 2023

**3. Alcohol-Related Prohibited Conduct** *Does the process ensure that a covered employee is not permitted to perform covered functions if the employee has engaged in prohibited conduct or an alcohol misuse rule of another DOT agency? (DA.ALCOHOL.PROHIBITEDCONDUCT.P)*

199.233 (199.215;199.217;199.219;199.221;199.223;40.23(c);40.285(a);40.285(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**  
IV sec R pg 33

**4. Alcohol Screening Test Devices** *Does the process for alcohol screening tests restrict the use of alcohol screening devices (ASDs) to the devices and associated requirements referenced by Part 40? (DA.ALCOHOL.SCREENINGTESTDEVICES.P)*  
 40.229 (40.235(e))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**  
 IV sec K pg 28

**5. Alcohol Confirmation Test Devices** *Does the process for alcohol confirmation tests restrict the use of Evidential Breath Testing Devices (EBTs) to the devices and associated requirements referenced by Part 40? (DA.ALCOHOL.CONFIRMATIONTESTDEVICES.P)*  
 40.231(a) (40.233(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**  
 IV Sec C, F

**6. Pre-Employment Alcohol Testing (Optional)** *If pre-employment alcohol testing is conducted, does the process ensure that such testing is performed within the limits of Part 199? (DA.ALCOHOL.PREEMPLOY.P)*  
 199.209(b) (199.209(b)(1);199.209(b)(2);199.209(b)(3))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**  
 IV sec N pg 31

**7. Post-Accident Alcohol Testing** *Does the process ensure that post-accident alcohol testing is conducted as required?* (DA.ALCOHOL.POSTACCIDENT.P)

199.225(a) (199.225(a)(1);199.225(a)(2);199.225(a)(3);199.227(b)(4))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**

VI sec P pg 32

**8. Reasonable Suspicion Alcohol Testing** *Does the process ensure that reasonable suspicion alcohol testing is conducted as required?* (DA.ALCOHOL.REASONSUSPECT.P)

199.225(b) (199.225(b)(1);199.225(b)(2);199.225(b)(3);199.225(b)(4);40.355(g);40.355(h))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**

VI sec Q pg 33

**9. Return-to-Duty Alcohol Testing** *Does the process ensure that return-to-duty alcohol testing is conducted as required?* (DA.ALCOHOL.RETURNDUTY.P)

199.225(c) (199.233;199.243(c);40.67(b);40.285(a);40.305(a))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**

VI Sec S pg 34

**10. Follow-Up Alcohol Testing** *Does the process ensure that follow-up alcohol testing is conducted as required?* (DA.ALCOHOL.FOLLOWUPTTEST.P)

199.225(d) (199.243(c)(2)(ii);40.307(a);40.307(b);40.309(a))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**

VI sec T Pg 34



**11. BAT/STT Alcohol Screening Test Reports** *Does the process ensure that alcohol screening test results are reported as required to the DER? (DA.ALCOHOL.SCREENINGTEST.P)*

40.247(a)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**

Sec 8 pg 57-59

**12. BAT Alcohol Confirmation Test Reports** *Does the process ensure that alcohol confirmation test results are reported as required to the DER? (DA.ALCOHOL.CONFIRMATIONTEST.P)*

40.255(a) (40.355(d))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**

Sec 8 pg 57-59

**13. Other Alcohol-Related Conduct** *Does the process ensure that a covered employee is prohibited from performing or continuing to perform covered functions when found to have an alcohol concentration of 0.02 or greater but less than 0.04? (DA.ALCOHOL.OTHERCONDUCT.P)*

199.237(a) (199.237(b);40.23(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**

IV sec G pg 26

**14. Available Resources for Employees Who Have Engaged in Prohibited Conduct**

*Does the process ensure that each covered employee who has engaged in prohibited conduct is advised of the resources available to the covered employee in evaluating and resolving problems associated with the misuse of alcohol?* (DA.ALCOHOL.EMPLOYEEERESOURCES.P)

199.243(a) (40.285(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**  
IV sec I pg 26 and 27

**15. Alcohol Misuse Program Educational Materials** *Do records indicate educational materials were provided that explain alcohol misuse requirements and the policies and procedures with respect to meeting those requirements?* (DA.ALCOHOL.EDUCATION.R)

199.239(a) (199.239(a)(1);199.239(a)(2))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**  
Samples in plan

**16. Alcohol Misuse Program Educational Materials Content** *Do records indicate the alcohol misuse educational materials provided by the operator included the required content?* (DA.ALCOHOL.EDUCATIONCONTENT.R)

199.239(b)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**  
Samples in plan

**17. Supervisory Personnel Alcohol Testing Reasonable Suspicion Training** *Does the process include the required 60-minute supervisory personnel training related to recognizing reasonable suspicion for alcohol testing?* (DA.ALCOHOL.SUPERVISORTRAINALCOHOL.P)

199.241

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
 Sec P 2 pg 30

## Drug and Alcohol - Drug and Alcohol Program Records

**1. Drug and Alcohol Program Recordkeeping** *Are drug and alcohol program records maintained and kept in a secure and proper location?* (DA.PROGRAMRECORDS.RECORDKEEPING.R)

199.117(b) (199.227(a);199.231(b);40.333(c);40.333(d);40.333(e))

Sat+	Sat	Concern	Unsat	NA	NC
					x

**Notes**  
 No 2023 tests conducted for review

**2. Required Drug Test Records** *Are drug test records retained for five years, three years, and one year as required and readily available?* (DA.PROGRAMRECORDS.DRUG.R)

199.117(a)  
 (199.117(a)(1);199.117(a)(2);199.117(a)(3);199.117(a)(4);199.117(a)(5);40.97(b);40.111(a);40.333(a)(1);40.333(a)(2);40.333(a)(4))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
 One year

**3. Required Alcohol Test Records** *Are alcohol test records retained for five years, three years, two years, and one year as required and readily available?* (DA.PROGRAMRECORDS.ALCOHOL.R) 199.227(b) (199.227(b)(1);199.227(b)(2);199.227(b)(3);199.227(b)(4);40.333(a)(1);40.333(a)(2);40.333(a)(3);40.333(a)(4))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**  
One year

## Records Review - Regulatory Reporting Performance

**1. Immediate Reporting: Incidents (detail)** *Do records indicate immediate notifications of incidents were made in accordance with 191.5?* (RPT.RR.IMMEDIATEREPORT.R) (detail)

191.5(a) (191.7(a))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Note**  
No incidents

**2. Incident Reports (detail)** *Do records indicate reportable incidents were identified and reports were submitted to DOT on Form 7100.2 (01-2002) within the required timeframe?* (RPT.RR.INCIDENTREPORT.R) (detail)

191.15(a)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Notes**  
No incidents

**3. Supplemental Incident Reports (detail)** *Do records indicate accurate supplemental incident reports were filed and within the required timeframe?* (RPT.RR.INCIDENTREPORTSUPP.R) (detail)

191.15(c)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Notes** No incidents

**4. Annual Report Records (detail)** *Have complete and accurate Annual Reports been submitted?* (RPT.RR.ANNUALREPORT.R) (detail)

191.17(a)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

**Notes**

Annual report for 2023 has not been submitted

**5. Safety Related Condition Reports (detail)** *Do records indicate safety-related condition reports were filed as required?* (RPT.RR.SRCR.R) (detail)

191.23(a) (191.25(a); 191.25(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Notes**

NO SRC

**6. Customer Notification (detail)** *Do records indicate the customer notification process satisfies the requirements of 192.16?* (MO.GO.CUSTNOTIFY.R) (detail)

192.16(d) (192.16(a); 192.16(b); 192.16(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**

New gas service packet is given to all new customers

## Records - Construction Performance

**1. Welding Procedures (detail)** *Do records indicate weld procedures are being qualified in accordance with 192.225?* (DC.WELDPROCEDURE.WELD.R) (detail)

192.225(a) (192.225(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Notes**

No welding conducted in 2023

**2. Qualification of Welders (detail)** *Do records indicate adequate qualification of welders?* (TQ.QUOMCONST.WELDER.R) (detail)

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))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Notes**

No welding conducted in 2023

**3. Inspection and Test of Welds (detail)** Do records indicate that individuals who perform visual inspection of welding are qualified by appropriate training and experience, as required by §192.241(a)? (DC.WELDINSP.WELDVISUALQUAL.R) (detail)

192.241(a) (192.241(b); 192.241(c); 192.807(a); 192.807(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Notes**

No welding conducted in 2023

**4. Qualification of Nondestructive Testing Personnel (detail)** Do records indicate the qualification of nondestructive testing personnel? (TQ.QUOMCONST.NDT.R) (detail)

192.243(b)(2) (192.807(a); 192.807(b); 192.328(a); 192.328(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Notes**

No welding conducted in 2023

**5. Nondestructive Test and Interpretation Procedures (detail)** Do records indicate that NDT implementation is adequate? (DC.WELDINSP.WELDNDT.R) (detail)

192.243(a) (192.243(b)(1); 192.243(b)(2); 192.243(c); 192.243(a))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Notes**

No welding conducted in 2023

**6. Transmission Lines Record Keeping (detail)** 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? (MO.GM.RECORDS.R) (detail)

192.605(b)(1) (192.243(f); 192.709(a); 192.709(b); 192.709(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Notes**

No transmission

**7. Plastic pipe - Qualifying Joining Procedures (detail)** Have plastic pipe joining procedures been qualified in accordance with 192.283? (DC.CO.PLASTICJOINTPROCEDURE.R) (detail)

192.273(b) (192.283(a); 192.283(b); 192.283(c); 192.283(d))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Notes**

No plastic joining for 2023 conducted

**8. Plastic pipe - Qualifying Joining Procedures (detail)** Do records indicate persons making joints in plastic pipelines are qualified in accordance with 192.285? (DC.CO.PLASTICJOINTQUAL.R) (detail)

192.285(d) (192.285(a); 192.285(b); 192.285(c); 192.807(a); 192.807(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes No plastic joining for 2023 conducted

**9. Qualification of Personnel Inspecting Joints in Plastic Pipelines (detail)** Do records indicate persons inspecting the making of plastic pipe joints have been qualified? (DC.CO.PLASTICJOINTINSP.R) (detail)

192.287 (192.807(a); 192.807(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Notes**

No plastic joining for 2023 conducted

**10. Underground Clearance (detail)** Do records indicate pipe is installed with clearances in accordance with 192.325, and (if plastic) installed as to prevent heat damage to the pipe? (DC.CO.CLEAR.R) (detail)

192.325(a) (192.325(b); 192.325(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Notes**

No new pipe installed

**11. Depth of Cover - Onshore (detail)** Is onshore piping minimum cover as specified in 192.327? (DC.CO.COVER.R) (detail)

192.327(a) (192.327(b); 192.327(c), 192.327(d); 192.327(e))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Notes**

No new pipe installed

**12. EFV Installation (detail)** Do records indicate the EFV program satisfies the requirements for installation and performance? (MO.GO.EFVINSTALL.R) (detail)

192.383(b) (192.381(a); 192.381(b); 192.381(c); 192.381(d); 192.381(e); 192.383(a); 192.383(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Notes** no new services installed

**13. Cathodic Protection post July 1971 (detail)** 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? (TD.CP.POST1971.R) (detail)

192.491(c) (192.455(a); 192.457(a); 192.452(a); 192.452(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Notes**

No new pipe installed

**Records - Operations And Maintenance Performance**

**3. Strength Test Requirements for Operations < 100 psig (detail)** Do records indicate that pressure testing is conducted in accordance with 192.509(a)? (DC.PT.LOWPRESS.PRESSTEST100PSIG.R) (detail)

192.517(a) (192.509(a); 192.509(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Notes**

No new pipe in 2023

**4. Test Requirements for Plastic Pipe (detail)** Do records indicate that pressure testing is conducted in accordance with 192.513? (DC.PT.PRESSTESTPLASTIC.R) (detail)

192.517(a) (192.513(a); 192.513(b); 192.513(c); 192.513(d))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Notes**

No new installed in 2023

**5. Normal Maintenance and Operations (detail)** Has the operator conducted annual reviews of the written procedures in the manual as required? (MO.GO.OMANNUALREVIEW.R) (detail)

192.605(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes** 7-2022 need to complete in 2023

**6. Normal Operations and Maintenance Procedures - History (detail)** Are construction records, maps and operating history available to appropriate operating personnel? (MO.GO.OMHISTORY.R) (detail)

192.605(a) (192.605(b)(3))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**

Maps and records reviewed

**7. Normal Operations and Maintenance Procedures - Review (detail)** Do records indicate periodic review of the work done by operator personnel to determine the effectiveness, and adequacy of the procedures used in normal operations and maintenance and modifying the procedures when deficiencies are found? (MO.GO.OMEFFECTREVIEW.R) (detail)

192.605(a) (192.605(b)(8))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**

Superintendent reviews work completed by employees

**8. Abnormal Operations (Review) (detail)** Do records indicate periodic review of work done by operator personnel to determine the effectiveness of the abnormal operation procedures and corrective action taken where deficiencies are found? (MO.GO.ABNORMAL.ABNORMALREVIEW.R) (detail)

192.605(a) (192.605(c)(4))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**

superintendent reviews work and corrects with employee if any issues

no issues indicated



**9. Damage Prevention Program (detail)** Does the damage prevention program meet minimum requirements specified in 192.614(c)? (PD.OC.PDPROGRAM.R) (detail)

192.614(c)	<b>Sat+</b>	<b>Sat</b>	<b>Concern</b>	<b>Unsat</b>	<b>NA</b>	<b>NC</b>
		x				

**Notes**

Sec 3

**11. Emergency Response Performance (detail)** Do records indicate review of employee activities to determine whether the procedures were effectively followed in each emergency? (EP.ERG.POSTEVTREVIEW.R) (detail)

192.605(a) (192.615(b)(1); 192.615(b)(3))	<b>Sat+</b>	<b>Sat</b>	<b>Concern</b>	<b>Unsat</b>	<b>NA</b>	<b>NC</b>
					x	

**Notes**

No emergencies reported or records

**12. Emergency Response Training (detail)** Has the operator trained the appropriate operating personnel on emergency procedures and verified that the training was effective in accordance with its procedures? (EP.ERG.TRAINING.R) (detail)

192.605(a) (192.615(b)(2))	<b>Sat+</b>	<b>Sat</b>	<b>Concern</b>	<b>Unsat</b>	<b>NA</b>	<b>NC</b>
		x				

**Notes**

Training has not been completed for 2023. Training will be completed and documented.

**13. Liaison with Public Officials (detail)** Do records indicate liaisons established and maintained with appropriate fire, police and other public officials and utility owners in accordance with procedures? (EP.ERG.LIAISON.R) (detail)

192.605(a) (192.615(c)(1); 192.615(c)(2); 192.615(c)(3); 192.615(c)(4); ADB-05-03)	<b>Sat+</b>	<b>Sat</b>	<b>Concern</b>	<b>Unsat</b>	<b>NA</b>	<b>NC</b>
		x				

**Notes**

Meeting with all officials will be conducted in August 2023

Meeting completed August 2022

**14. Incident Investigation (detail)** Do records indicate actions initiated to analyze accidents and failures, including the collection of appropriate samples for laboratory examination to determine the causes of the failure and minimize the possibility of recurrence, in accordance with its procedures? (EP.ERG.INCIDENTANALYSIS.R) (detail)

192.605(a) (192.617)	<b>Sat+</b>	<b>Sat</b>	<b>Concern</b>	<b>Unsat</b>	<b>NA</b>	<b>NC</b>
					x	

**Notes**

No incidents

**15. General - Testing Requirements (detail)** Do records indicate that pressure testing is conducted in accordance with 192.503? (DC.PT.PRESSTEST.R) (detail)

192.503(a) (192.503(b); 192.503(c); 192.503(d))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Notes**

No pipe installed

**18. Maximum Allowable Operating pressure (detail)** Do records indicate determination of the MAOP of pipeline segments in accordance with 192.619 and limiting of the operating pressure as required? (MO.GOMAOP.MAOPDETERMINE.R) (detail)

192.709 (192.619; 192.621; 192.623)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes** Sec 6 O&M

**20. Odorization of Gas (detail)** Do records indicate appropriate odorization of its combustible gases in accordance with its procedures and conduct of the required testing to verify odorant levels met requirements? (MO.GOODOR.ODORIZE.R) (detail)

192.709(c) (192.625(a); 192.625(b); 192.625(c); 192.625(d); 192.625(e); 192.625(f))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**

Brian Allard conducted odor readings: OQ- 3-14-2026  
 2023 records reviewed no issues identified  
 Readings are taken two times a month per order  
 Last reading completed 6-22-2023  
 5499 Hwy 176 Drakesboro 0.50/0.40  
 3338 Merle Travis 0.56/0.40  
 925 Union Ridge 0.53/0.40  
 2 Rivers 7158 Hwy 70 0.56/0.40

**22. Patrolling Requirements (detail)** Do records indicate that ROW surface conditions have been patrolled as required? (PD.RW.PATROL.R) (detail)

192.709(c) (192.705(a); 192.705(b); 192.705(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**

2023 records reviewed conducted in Brian Allard  
 Monthly patrolling conducted no issues identified

**23. Liaison with Emergency and Other Public Officials (detail)** Have liaisons been established and maintained with appropriate fire, police, and other public officials? (PD.PA.LIAISON.R) (detail)

192.616(c) (API RP 1162 Section 4.4)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**

Meetings conducted annually and works well with fire, police, and utilities

**26. Distribution Leakage Surveys (detail)** Do records indicate distribution leakage surveys were conducted as required? (PD.RW.DISTLEAKAGE.R) (detail)

192.603(b) (192.721(a); 192.721(b); 192.723(a); 192.723(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**

2022 leaks reviewed -4 leaks  
 System Wide survey completed June 12, 2023 through June 15, 2023  
 6 leaks total mains  
 3 service line leaks 1 below ground 2 aboveground  
 7 class 2 leaks  
 2 class 3 leaks

**27. Test Reinstated Service Lines (detail)** From the review of records, did the operator properly test disconnected service lines? (AR.RMP.TESTREINSTATE.R) (detail)

192.603(b) (192.725(a), 192.725(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Notes** no 3<sup>rd</sup> party damages

**30. Abandonment or Deactivation of Pipeline and Facilities (detail)** Do records indicate pipelines were abandoned or deactivated as required? (MO.GM.ABANDONPIPE.R) (detail)

192.709(c) (192.727(a); 192.727(b); 192.727(c); 192.727(d); 192.727(e); 192.727(f); 192.727(g))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Notes**

No lines abandoned

**32. Pressure Limiting and Regulating Stations Inspection and Testing (detail)** Do records indicate inspection and testing of pressure limiting, relief devices, and pressure regulating stations as required and at the specified intervals? (MO.GMOPP.PRESSREGTEST.R) (detail)

192.709(c) (192.739(a); 192.739(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**

Last inspection conducted by usdi 7-6-2022  
 2023 has not been conducted at this time scheduled for last of July first week of August.

**34. Pressure Limiting and Regulating Stations Capacity of Relief Devices (detail)** 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 and a new or additional device installed if determined to have insufficient capacity? (MO.GMOPP.PRESSREGCAP.R) (detail)

192.709(c) (192.743(a); 192.743(b); 192.743(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**

Last inspection conducted by usdi 7-6-2022  
 2023 has not been conducted at this time scheduled for last of July first week of August.

**38. Valve Maintenance Distribution Lines (detail)** Do records indicate proper inspection and partial operation of each distribution system valve that might be required in an emergency at intervals not exceeding 15 months, but at least once each calendar year, and prompt remedial action to correct any valve found inoperable? (MO.GM.DISTVALVEINSPECT.R) (detail)

192.603(b) (192.747)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**

7 emergency valve locations conducted 7-6-2022

2023 has not been conducted at time of inspection.

**39. Vault Inspection (detail)** Do records document inspections at the required interval of all vaults having a volumetric internal content of 200 cubic feet (5.66 cubic meters) or more that house pressure regulating/limiting equipment? (FS.FG.VAULTINSPECTFAC.R) (detail)

192.709(c) (192.749(a); 192.749(b); 192.749(c); 192.749(d))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Notes**

No vaults

**41. Prevention of Accidental Ignition (detail)** Do records indicate personnel followed procedures for minimizing the danger of accidental ignition where the presence of gas constituted a hazard of fire or explosion? (MO.GM.IGNITION.R) (detail)

192.709 (192.751(a); 192.751(b); 192.751(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Notes**

No issues indicated during inspection

**43. Bell and Spigot Joints (detail)** Do records indicate that caulked bell and spigot joints were correctly sealed? (MO.GM.BELLSPIGOTJOINT.R) (detail)

192.603(b) (192.753(a); 192.753(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Notes**

No cast iron

## Records - Corrosion Control Performance

**1. Corrosion Control Records (detail)** Do records indicate the location of all items listed in 192.491(a)? (TD.CP.RECORDS.R) (detail)

192.491(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**

**2. Examination of Exposed Portions of Buried Pipe (detail)** *Do records adequately document that exposed buried piping was examined for corrosion?* (TD.CPEXPOSED.EXPOSEINSPECT.R) (detail)

192.491(c) (192.459)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Notes**

No main exposures at this time

**3. Cathodic Protection Monitoring (detail)** *Do records adequately document cathodic protection monitoring tests have occurred as required?* (TD.CPMONITOR.TEST.R) (detail)

192.491(c) (192.465(a))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**

2023 – readings conducted by usdi refer to sheet

**4. Rectifier or other Impressed Current Sources (detail)** *Do records document details of electrical checks of sources of rectifiers or other impressed current sources?* (TD.CPMONITOR.CURRENTTEST.R) (detail)

192.491(c) (192.465(b))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

**Notes**

Rectifier was only inspected in June 2023

Required to inspect 6 times a year not to exceed 2 ½ months per 192.465 b1

**5. Bonds, Diodes and Reverse Current Switches (detail)** *Do records document details of electrical checks interference bonds, diodes, and reverse current switches?* (TD.CPMONITOR.REVCURRENTTEST.R) (detail)

192.491(c) (192.465(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Notes**

No issues identified

**6. Correction of Corrosion Control Deficiencies (detail)** *Do records adequately document actions taken to correct any identified deficiencies in corrosion control?* (TD.CPMONITOR.DEFICIENCY.R) (detail)

192.491(c) (192.465(d))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Notes**

no issues identified at this time

**7. Unprotected Buried Pipelines (typically bare pipelines) (detail)** *Do records adequately document the re-evaluation of buried pipelines with no cathodic protection for areas of active corrosion?* (TD.CP.UNPROTECT.R) (detail)

192.491(c) (192.465(e))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Notes**

No bare steel

**8. Isolation from Other Metallic Structures (detail)** 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? (TD.CP.ELECSOLATE.R) (detail)

192.491(c) (192.467(a); 192.467(b); 192.467(c); 192.467(d); 192.467(e))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Notes**

Does not apply

**9. Test Leads Installation (detail)** Do records document that pipelines with cathodic protection have electrical test leads installed in accordance with requirements of Subpart I? (TD.CP.MONITOR.TESTLEAD.R) (detail)

192.491(c) (192.471(a); 192.471(b); 192.471(c); 192.469)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**

No issues identified

**10. Interference Currents (detail)** Do records document that the operator has minimized the detrimental effects of stray currents when found? (TD.CP.MONITOR.INTFRCURRENT.R) (detail)

192.491(c) (192.473(a))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**

No issues identified

**11. Internal Corrosion (detail)** Do records document if corrosive gas is being transported by pipeline, including the investigation of the corrosive effect of the gas on the pipeline and steps that have been taken to minimize internal corrosion? (TD.ICP.CORRGAS.R) (detail)

192.491(c) (192.475(a))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Notes**

Pipeline quality gas received from Texas Gas no issues

**12. Internal Corrosion in Cutout Pipe (detail)** Do records document examination of removed pipe for evidence of internal corrosion? (TD.ICP.EXAMINE.R) (detail)

192.491(c) (192.475(a); 192.475(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Notes**

Pipeline quality gas received from Texas Gas no issues

**13. Internal Corrosion Control: Design and Construction (192.476) (detail)** 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? (DC.DPC.INTCORRODE.R) (detail)

192.476(a) (192.476(b); 192.476(c); .476(d))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Notes**

Pipeline quality gas received from Texas Gas no issues

**14. Internal Corrosion Corrosive Gas Actions (detail)** Do records document the actions taken when corrosive gas is being transported by pipeline? (TD.ICP.CORRGASACTION.R) (detail)

192.491(c) (192.477)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Notes**

Pipeline quality gas received from Texas Gas no issues

**15. Atmospheric Corrosion Monitoring (detail)** Do records document inspection of aboveground pipe for atmospheric corrosion? (TD.ATM.ATMCORRODEINSP.R) (detail)

192.491(c) (192.481(a); 192.481(b); 192.481(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**

Last assessment 2021 no issues identified

Painting system in 2023

**16. New Buried Pipe Coating (detail)** Do records document that each buried or submerged pipeline installed after July 31, 1971, has been protected against external corrosion with an adequate coating unless exempted under 192.455(b)? (TD.COAT.NEWPIPE.R) (detail)

192.491(c) (192.455(a)(1); 192.461(a); 192.461(b); 192.483(a))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Notes**

No new installed steel pipe all pipe protected by anode and rectifier

**17. Repair of Internally Corroded Pipe (detail)** 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? (TD.ICP.REPAIR.R) (detail)

192.485(a) (192.485(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Notes**

No issues identified

**18. Evaluation of Internally Corroded Pipe (detail)** Do records document adequate evaluation of internally corroded pipe? (TD.ICP.EVALUATE.R) (detail)

192.491(c) (192.485(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Notes**

No issues identified

## Field Review - Pipeline Inspection (Field)

**2. Cathodic Protection Monitoring Criteria (detail)** Are methods used for taking CP monitoring readings that allow for the application of appropriate CP monitoring criteria? (TD.CPMONITOR.MONITORCRITERIA.O) (detail)

192.463(a)

Sat+	Sat	Concern	Unsat	NA	NC
					x

**Notes**

Consultant takes readings once a year not conducted by drakesboro

**3. Rectifier or other Impressed Current Sources (detail)** Are impressed current sources properly maintained and are they functioning properly? (TD.CPMONITOR.CURRENTTEST.O) (detail)

192.465(b)

Sat+	Sat	Concern	Unsat	NA	NC
					x

**Notes**

No readings conducted at rectifier only visual inspection last inspection 6-2023

**5. Atmospheric Corrosion Monitoring (detail)** Is pipe that is exposed to atmospheric corrosion protected? (TD.ATM.ATMCORRODEINSP.O) (detail)

192.481(b) (192.481(c); 192.479(a); 192.479(b); 192.479(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**

System has been recently painted no atmospheric corrosion

**6. Normal Operations and Maintenance Procedures - Review (detail)** Are operator personnel knowledgeable of the procedures used in normal operations? (MO.GO.OMEFFECTREVIEW.O) (detail)

192.605(b)(8)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**

Field inspection conducted with Superintendent Brian Jones very knowledgeable of system



**7. Placement of ROW Markers (detail)** *Are line markers placed and maintained as required?*  
 (PD.RW.ROWMARKER.O) (detail)

192.707(a) (CGA Best Practices, v4.0, Practice 2-5;  
 CGA Best Practices, v4.0, Practice 4-20)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**

Verified during field inspection

**8. Placement of ROW Markers (detail)** *Are line markers placed and maintained as required for above ground pipelines?* (PD.RW.ROWMARKERABOVE.O) (detail)

192.707(c) (CGA Best Practices, v4.0, Practice 2-5;  
 CGA Best Practices, v4.0, Practice 4-20)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**

Verified during field inspection

**10. Pressure Telemetry or Recording Gauges (detail)** *Are telemetry or recording gauges properly utilized as required for distribution systems?* (MO.GMOPP.PRESSREGMETER.O) (detail)

192.741(a) (192.741(b); 192.741(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**

Visual inspection conducted

**11. Pressure Limiting and Regulating Stations Inspection and Testing (detail)** *Are field or bench tests or inspections of regulating stations, pressure limiting stations or relief devices adequate?* (MO.GMOPP.PRESSREGTEST.O) (detail)

192.739(a) (192.739(b); 192.743)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**

Visual inspection conducted

**13. Prevention of Accidental Ignition (detail)** *Perform observations of selected locations to verify that adequate steps have been taken by the operator to minimize the potential for accidental ignition.* (AR.RMP.IGNITION.O) (detail)

192.751(a) (192.751(b); 192.751(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**

No issues identified

# Training and Qualification - OQ Protocol 9

**1. Covered Task Performance (detail)** *Verify the qualified individuals performed the observed covered tasks in accordance with the operator's procedures or operator approved contractor procedures.* (TQ.PROT9.TASKPERFORMANCE.O) (detail)

192.801(a) (192.809(a))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**

Bryan Allard odor test conducted odor 3-14-2026

**2. Qualification Status (detail)** *Verify the individuals performing the observed covered tasks are currently qualified to perform the covered tasks.* (TQ.PROT9.QUALIFICATIONSTATUS.O) (detail)

192.801(a) (192.809(a))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**

Bryan Allard odor test conducted odor 3-14-2026

**3. Abnormal Operating Condition Recognition and Reaction (detail)** *Verify the individuals performing covered tasks are cognizant of the AOCs that are applicable to the tasks observed.* (TQ.PROT9.AOCRECOG.O) (detail)

192.801(a) (192.809(a))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**

Bryan Allard verified AOC no issues

**4. Verification of Qualification (detail)** *Verify the qualification records are current, and ensure the personal identification of all individuals performing covered tasks are checked, prior to task performance.* (TQ.PROT9.VERIFYQUAL.O) (detail)

192.801(a) (192.809(a))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

**Notes**

Bryan Allard odor test conducted odor 3-14-2026

**5. Program Inspection Deficiencies (detail)** *Have potential issues identified by the headquarters inspection process been corrected at the operational level?* (TQ.PROT9.CORRECTION.O) (detail)

192.801(a) (192.809(a))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

**Notes**

No issues



# CITY OF DRAKESBORO

P.O. Box 129 • Mose Rager Blvd. • Drakesboro, KY 42337  
270-476-8986  
(888) 662-2406 (Voice/TTY): (866) 577-5762 (Español)

09/05/2023

Melissa Holbrook  
Kentucky Public Service Commission  
PO Box 615  
Frankfort, KY 40602

RECEIVED

SEP 05 2023

PUBLIC SERVICE  
COMMISSION

Re: Drakesboro Natural Gas violations received during inspection

To Whom It May Concern,

In January 2023, Drakesboro Natural Gas changed office and administrative staff and has recently implemented the following tasks:

- The 7100 Annual Report will now going forward be submitted yearly by Drakesboro Natural Gas with assistance from Jason Brangers with USDI.
- Beginning in September 2023, Drakesboro Natural Gas will take rectifier reads monthly instead of every 60 days not to exceed 75 days. We now have a trained operator and qualified staff to carry out this report.

If you have any questions or need further assistance, please do not hesitate to contact either myself or the mayor at 270-476-8986 or [drakesborogas@gmail.com](mailto:drakesborogas@gmail.com).

Thank you,

Eddie Brake, Mayor

Brian Jones, Utility Superintendent

\*Drakesboro Natural Gas Co.  
212 Mose Rager Boulevard  
P. O. Box 129  
Drakesboro, KY 42337

\*Drakesboro Natural Gas Co.  
Drakesboro Natural Gas Co.  
212 Mose Rager Boulevard  
P. O. Box 129  
Drakesboro, KY 42337

\*Ryan Driskill  
Attorney  
Yonts, Sherman & Driskill, P.S.C.  
P.O. Box 370  
Greenville, KY 42345