



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

Angie Hatton
Chair

Mary Pat Regan
Commissioner

John Will Stacy
Commissioner

September 20, 2024

PARTIES OF RECORD

Re: Case No. 2019-00065

Notice is given to all parties that the attached Drakesboro Inspection Report 2020 has been filed into the record of this proceeding.

If you have any comments you would like to make regarding the contents of the document, please do so within five days of receipt of this letter. If you have any questions, please contact Jason Colyer, Staff Attorney, at Jason.Colyer@ky.gov.

Sincerely,

A handwritten signature in blue ink that reads "Linda C. Bridwell".

Linda C. Bridwell, PE
Executive Director

Attachment

INSPECTION REPORT

INSPECTION INFORMATION

| | | | |
|----------------------|---|----------------|---------------------|
| KY PSC Inspector(s): | Melissa Holbrook | Report Number: | Drakesboro-12152020 |
| Inspection Date(s): | 11-23-25-2020 and December 9-11,14-2020 | Report Date: | 12-15-2020 |
| Inspection Type: | <input checked="" type="checkbox"/> Standard <input type="checkbox"/> Integrity Management <input type="checkbox"/> Operator Qualification <input type="checkbox"/> Compliance Follow-up <input type="checkbox"/> Construction | | |

OPERATOR INFORMATION

| | | | |
|--|--|---|--|
| Name of Operator: | City of Drakesboro | OP ID No.: (If no OP ID No., explain if an application has been submitted.) | 3538 |
| Type of Facility: | Municipal | Location of Facility: | City of Drakesboro |
| Area of Operation: | City of Drakesboro | | |
| <u>Official Operator Contact and Address: (Contact for Inspection Letter)</u> | | <u>Unit Name and Address</u> | |
| Mayor Mike Jones P.O. Box 129 Drakesboro, KY 42337 | | | |
| Phone # and Email: | 270-476-8986 jonesy0120@gmail.com | | |
| Records Location: | Main office and Russmar Due to positive covid cases inspection was conducted by email and telephone. | | |
| <u>Persons Interviewed</u> | <u>Title</u> | <u>Phone No.</u> | <u>Email</u> |
| Jeff Roberts | Russmar | 606-875-4655 | Jeff.roberts@russmarutilities.com |
| | | | |
| | | | |
| | | | |
| Has the Operator provided an updated Emergency Contact List? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | | | |
| Number of Customers: | 639 | | |
| Number of Gas Employees: | 2- Dee Sims and Russmar Marvin Anderson | | |
| Gas Supplier: | Texas Gas | | |
| Unaccounted for Gas: | 14% | | |
| 7100 Submitted Date: | # of Leaks | # Excavation Tickets | # Excavation Damages |
| 2-18-2020 | 6 | 442 | 2 |
| Operating Pressure(s): | MAOP (within last year) | Actual Operating Pressure (at time of inspection) | |
| | Feeder: | 175 psi | |
| | Town: | 125psi | |
| Other: | 40 psi | | |
| Does the Operator have any transmission pipeline (above 20% SMYS): | n/a | | |
| <u>Additional Operator Information:</u> | | | |
| | | | |

| | | | |
|--------------------------|-----------|---------------------------|---|
| Date of Last Inspection: | 8-22-2019 | | |
| Number of Deficiencies: | 35 | Deficiencies not Cleared: | 0 |

Summary of Areas Inspected

| <u>PHMSA Question Set</u> | | |
|---|---|---|
| <input checked="" type="checkbox"/> Emergency Plan | <input checked="" type="checkbox"/> Operations and Maintenance Plan | <input checked="" type="checkbox"/> Critical Valves Maintenance Inspections |
| <input checked="" type="checkbox"/> Cathodic Protection | <input type="checkbox"/> Accidents | <input checked="" type="checkbox"/> Leak Surveys |
| <input checked="" type="checkbox"/> Odorization | <input checked="" type="checkbox"/> Operator Qualification | <input checked="" type="checkbox"/> Damage Prevention |
| <input type="checkbox"/> Pipeline Markers | <input checked="" type="checkbox"/> Regulator Stations | <input checked="" type="checkbox"/> DIMP |
| <input type="checkbox"/> Field Inspection | <input type="checkbox"/> Other | |
| <u>Other:</u> | | |
| | | |

Summary

The 2020 standard inspection for City of Drakesboro was conducted virtually via email and telephone.

The inspection consisted of an opening email sent to City of Drakesboro and Russmar requesting plans and records.

The inspection consisted of a detailed review of operation and maintenance, emergency, damage prevention, operator qualification, drug and alcohol, distribution integrity management, and public awareness plans. Also, reviewed were random sample 2020 records pertaining to leakage surveys and repairs, third party damage, valve inspections, patrolling, atmospheric corrosion, regulator inspections, cathodic protection, public awareness, and odorant verifications. Concerning the NTSB Supplemental Inspection Questions, please see the comments in that question set on pages 75-77 of this report.

Due to covid restrictions, no field inspection was conducted.

The closing conference was conducted via email and telephone.

Deficiency

- The operator has not taken prompt remedial action to correct low pipe to soil readings per CFR Part 192.465 (d). All pipe to soil readings taken were below required -0.85.

Area of Concern

After the 2020 inspection, the operator patrolling records indicated numerous steel and short plastic sections exposed. PSC requires an action plan to remedy exposed pipe sections with the deficiency response letter.

The operator has 5 of the ten regulators that are obsolete and no longer have replacement parts available. The contractor recommended replacing regulators.

Submitted By:

Melissa C. Holbrook —

Melissa C. Holbrook
Assistant Director DOI

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

OM Sec 2 pg 4

*** 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

OM Sec pg 4

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

OM Sec 2 pg 5

*** 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

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | x | | | | |

OM Sec 2 pg 9

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

OM Sec 2 Pg 6,7

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

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
OM Sec 2 Pg 6,7

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
OM Sec 10 pg 41

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
Om sec 13 pg 48

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
Om Sec 1 pg 3

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
Om Sec 1 pg 3

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
OM Sec 15

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
OM Sec 1 pg 3

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
OM Sec 18

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
No bottle type holders in 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
OM Sec 6

Procedures - Change In Class Location

1. Change in Class Location Required Study (detail) *Does the process include a requirement that the operator conduct a study whenever an increase in population density indicates a change in the class location of a pipeline segment operating at a hoop stress that is more than 40% SMYS? (MO.GOCLASS.CLASSLOCATESTUDY.P) (detail)*

192.605(b)(1) (192.609(a); 192.609(b); 192.609(c);
192.609(d); 192.609(e); 192.609(f))

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes

Operator does not operate 40% over SYMS

*** 2. Change in Class Location Confirmation or Revision of MAOP (detail)** *Does the process include a requirement that the MAOP of a pipeline segment be confirmed or revised within 24 months whenever the hoop stress corresponding to the established MAOP is determined not to be commensurate with the existing class location? (MO.GOCLASS.CLASSLOCATEREV.P) (detail)*

192.605(b)(1) (192.611(a); 192.611(b); 192.611(c);
192.611(d))

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes

Does not apply to system

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))

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | x | | | | |

Notes

OM Sec 21 pg 78

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)

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | x | | | | |

Notes

Damage Prevention plan reviewed

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)

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | x | | | | |

Notes

EP- pg 1

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))

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | x | | | | |

Notes

EP- Sec A 4 pg 1

*** 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))

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | x | | | | |

Notes

Gas detected inside or near bldg. om sec 6
Fire and explosions ep sec b pg 4
Natural disaster ep-sec c pg 2

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

Ep throughout plan

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

Section I Introduction
Section IV, B
Section V ,E
Section IX, B1

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

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
EM Plan IV, C
O+M Section 3, 15, 18

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
EP Sec I

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
EM Plan Section IV

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
EM Plan Section IV
O+M Plan Section 19,18

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
OM sec 3

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

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
EP sec 12

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.POSTEVNTREVIEW.P) (detail)

192.615(b)(3)

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | x | | | | |

Notes
EP sec 12

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
EP- sec 10

Procedures - Public Awareness Program

1. Public Education Program (detail) *Has the continuing public education (awareness) program been established as required?* (PD.PA.PROGRAM.P) (detail)

192.616(a) (192.616(h))

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | | x |

Notes
Refer to pape in checklist

2. Management Support of Public Awareness Program (detail) *Does the operator's program documentation demonstrate management support?* (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 |

Notes
Refer to pape in checklist

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

3. Asset Identification (detail) *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?* (PD.PA.ASSETS.P) (detail)

192.616(b) (API RP 1162 Section 2.7 Step 4)

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | | x |

Notes
Refer to pape in checklist

4. Audience Identification (detail) *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?* (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 |

Notes
Refer to pape in checklist

5. 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
Refer to pape in checklist

6. 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
Refer to pape in checklist

7. 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
Refer to pape in checklist

8. 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
Refer to pape in checklist

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

9. Master Meter and Petroleum Gas Systems (detail) *Does the master meter or petroleum gas system operator's process meet the requirements of 192.616(j)? (PD.PA.MSTRMETER.P) (detail)*

192.616(j) (192.616(h))

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes
Operator does not have master meter facilities

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
Section IV of the O+M Plan Section 3

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
OM Sec 15

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 18

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 | | | | |

| |
|---|
| <p>Notes Om sec 14</p> <p>Plan states drakesboro will conduct 2 odor tests a month</p> |
|---|

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 | | | | |

| |
|-----------------------------------|
| <p>Notes OM Sec 15</p> |
|-----------------------------------|

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 | | | | |

| |
|-----------------------------------|
| <p>Notes OM sec 15</p> |
|-----------------------------------|

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 | | | | |

| |
|-----------------------------------|
| <p>Notes OM sec 20</p> |
|-----------------------------------|

Procedures – Control Room Management

See separate Control Room Management question set.

Procedures - Transmission Lines - Patrolling & Leakage Survey

1. Patrolling Requirements (detail) *Does the process adequately cover the requirements for patrolling the ROW and conditions reported?* (PD.RW.PATROL.P) (detail)

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

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes

Operator has no transmission lines

2. Leakage Surveys (detail) *Does the process require leakage surveys to be conducted?* (PD.RW.LEAKAGE.P) (detail)

192.706 (192.706(a); 192.706(b))

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes

Operator has no transmission lines

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

OM sec 6

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

OM sec 4

Procedures - Transmission Record Keeping

1. Transmission Lines Record Keeping (detail) *Does the process include a requirement that the operator maintain a record of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test? (MO.GM.RECORDS.P) (detail)*

192.605(b)(1) (192.709(a); 192.709(b); 192.709(c); 192.743(f))

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes

Operator has no transmission lines

Procedures - Transmission Field Repair

1. Transmission Lines Permanent Field Repair of Defects (detail) *Is the process adequate for the permanent field repair of defects in transmission lines? (AR.RMP.FIELDREPAIRDEFECT.P) (detail)*

192.605(b)(1) (192.713(a); 192.713(b))

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes

Operator has no transmission lines

2. Transmission Lines Permanent Field Repair of Welds (detail) *Is the process adequate for the permanent field repair of welds? (AR.RMP.FIELDREPAIRWELDS.P) (detail)*

192.605(b) (192.715(a); 192.715(b); 192.715(c))

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes

Operator has no transmission lines

3. Transmission Lines Permanent Field Repair of Leaks (detail) *Is there an adequate process for the permanent field repair of leaks on transmission lines? (AR.RMP.FIELDREPAIRLEAK.P) (detail)*

192.605(b) (192.717(a); 192.717(b))

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes

Operator has no transmission lines

4. Transmission Lines Testing of Repairs (detail) *Is the process adequate for the testing of replacement pipe and repairs made by welding on transmission lines? (AR.RMP.WELDTTEST.P) (detail)*

192.605(b) (197.719(a); 197.719(b))

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes

Operator has no transmission lines

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
Om sec 6 pg 31

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
OM sec 11

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
OM sec 7

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 |
|-------|-----|---------|-------|----|----|
| | | | | | |

Notes
OM Sec 7B

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
OM Sec 7 A

Procedures - Valve And Vault Maintenance

1. Valve Maintenance Transmission Lines (detail) *Does the process include procedures for inspecting and partially operating each transmission line valve that might be required in an emergency at intervals not exceeding 15 months, but at least once each calendar year and for taking prompt remedial action to correct any valve found inoperable?* (MO.GM.VALVEINSPECT.P) (detail)

192.605(b)(1) (192.745(a); 192.745(b))

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes
Operator has no transmission lines

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
OM sec 8

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
Operator has no vaults in system

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
OM sec 12

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

Does not apply to operator

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

Operator does not have 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

OM Sec 17

*** 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

OM sec 17 sec E

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 E

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
OM sec 17 F

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
OM Sec 17 G 7

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
OM sec 17 G 3

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
OM sec 17 G

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

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

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | x | | | | |

Notes
OM sec 17 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.WELDINSPECTION.WELDREPAIR.P) (detail)

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

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | x | | | | |

Notes
OM sec 17 J

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

OM sec 17 K

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

OM Sec 18 starts pg 4 fusion mechanical joining, socket fusion, butt, and sidewall fusion

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

OM Sec 18 starts pg 4 fusion mechanical joining, socket fusion, butt, and sidewall fusion

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

OM Sec 18 C starts pg 4 fusion mechanical joining, socket fusion, butt, and sidewall fusion

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

OM Sec 18 C starts pg 4 fusion mechanical joining, socket fusion, butt, and sidewall fusion

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

OM Sec 9 pg 34

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

OM Sec 9 pg 34

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

Operator has no converted gas services

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

OM sec 9 pg 34

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 to operator

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
OM sec 9 pg 34

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 |
|-------|-----|---------|-------|----|----|
| | | | | | |

Notes
Om sec 9

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 |
|-------|-----|---------|-------|----|----|
| | | | | | |

Notes
Om sec 9 5 a pg 36

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
OM sec 9 pg 35

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 system

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

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

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | x | | | | |

Notes
Om sec 9 pg 35

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.CP.MONITOR.CURRENTTEST.P) (detail)

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

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | x | | | | |

Notes
OM Sec 9 G pg 37

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.CP.MONITOR.REVCURRENTTEST.P) (detail)

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

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | x | | | | |

Notes
OM Sec 9 G pg 37

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

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

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | x | | | | |

Notes
Om pg 35 3 a

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
OM sec 9

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
OM Sec 9 Dec d

17. Test Leads Installation (detail) *Does the process provide adequate instructions for the installation of test leads?* (TD.CP.MONITOR.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
OM Sec 9 sec 4 pg 36

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
OM Sec 9 H pg 37

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
OM Sec 9 F pg 37

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
OM Sec 9 F pg 37

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
OM Sec 9 F pg 37

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
OM Sec 9 F pg 37 no corrosive gas being transported

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
Om sec 9 C pg 36

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
Om sec 9 C pg 36

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
OM Sec 9 E

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
OM Sec 9 E

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
OM Sec 9 I pg 38

Field Review - Pipeline Inspection (Field)

1. Transmission Line Valve Spacing (detail) *Are transmission line valves being installed as required of 192.179? (DC.DPC.VALVESPACE.O) (detail)*

192.141 (192.179(a); 192.179(b); 192.179(c); 192.179(d))

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes
No transmission

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

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
Due to covid restriction no field inspection was conducted

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
Due to covid restriction no field inspection was conducted

4. Internal Corrosion Control: Design and Construction (192.476) (detail) *Does the transmission project's design and construction comply with 192.476?* (DC.DPC.INTCORRODE.O) (detail)

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

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes
No transmission

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
Due to covid restriction no field inspection was conducted

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
Due to covid restriction no field inspection was conducted

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
Due to covid restriction no field inspection was conducted

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

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
Due to covid restriction no field inspection was conducted

9. Transmission Lines Testing of Repairs (detail) *Does the operator properly test replacement pipe and repairs made by welding on transmission lines? (AR.RMP.WELDTTEST.O) (detail)*

192.719(a) (192.719(b))

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes
No transmission

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
Due to covid restriction no field inspection was 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
Due to covid restriction no field inspection was conducted

12. Valve Maintenance Transmission Lines (detail) *Are field inspection and partial operation of transmission line valves adequate? (MO.GM.VALVEINSPECT.O) (detail)*

192.745(a) (192.745(b))

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes
No transmission

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
Due to covid restriction no field inspection was conducted

Records - Regulatory Reporting Performance

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

191.5(a) (191.7(a))

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Note

No incidents reported

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 reportable 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 reportable 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

Verified on phmsa portal submitted 2-18-2020

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 reported

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

Sent to customers 2-3-2020

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

7. NPMS: Abandoned Underwater Facility Reports (detail) *Do records indicate reports were filed for abandoned offshore pipeline facilities or abandoned onshore pipeline facilities that crosses over, under or through a commercially navigable waterway? (RPT.RR.NPMSABANDONWATER.R) (detail)*

192.727(g)

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes
Does not apply to operator

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
Records were not checked at this inspection will check during construction inspection

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
Records were not checked at this inspection will check during construction inspection

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.WELDINSPECTION.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
Records were not checked at this inspection will check during construction inspection

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
Records were not checked at this inspection will check during construction inspection

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

5. Nondestructive Test and Interpretation Procedures (detail) *Do records indicate that NDT implementation is adequate?* (DC.WELDINSR.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
Records were not checked at this inspection will check during construction inspection

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
Records were not checked at this inspection will check during construction inspection

No fusion was conducted in 2020

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
Records were not checked at this inspection will check during construction inspection

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.PLASTICJOINTINSR.R) (detail)

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

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | | x |

Notes
Records were not checked at this inspection will check during construction inspection

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
Records were not checked at this inspection will check during construction inspection

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

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
Records were not checked at this inspection will check during construction inspection

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
Work order reviewed installed EFV

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
Records were not checked at this inspection will check during construction inspection

Records - Operations And Maintenance Performance

1. Strength Test Requirements for SMYS > 30%. (detail) *Is pressure testing conducted in accordance with 192.505? (DC.PT.PRESSTESTHIGHSTRESS.R) (detail)*

| | | | | | | |
|---|-------|-----|---------|-------|----|----|
| 192.517(a) (192.505(a); 192.505(b); 192.505(c); 192.505(d); 192.505(e)) | Sat + | Sat | Concern | Unsat | NA | NC |
| | | | | | x | |

Notes
System does not operate at this pressure

2. Strength Test Duration Requirements for SMYS < 30% (detail) *Do records indicate that pressure testing is conducted in accordance with 192.507? (DC.PT.LOWPRESS.PRESSTESTLOWSTRESS.R) (detail)*

| | | | | | | |
|---|-------|-----|---------|-------|----|----|
| 192.517(a) (192.507(a); 192.507(b); 192.507(c)) | Sat + | Sat | Concern | Unsat | NA | NC |
| | | x | | | | |

Notes
Work orders reviewed

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

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
Work orders reviewed tested 90lbs air for an hour

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
Work orders reviewed tested 90lbs air for an hour

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
6-8-2020 completed by Jeff Roberts Russmar record reviewed

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
Russmar and City employees have access to what records are still available

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
At this time City of Drakesboro employee Dee Sims works with 3rd party contractor Russmar Marvin Anderson to gain experience in gas maintenance activities. Russmar is assisting in overseeing activities. Work orders are completed to review employee work

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
Records indicated no issues

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

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)

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | x | | | | |

Notes
Plan reviewed

10. Change in Class Location Required Study (detail) *Do records indicate performance of the required study whenever the population along a pipeline increased or there was an indication that the pipe hoop stress was not commensurate with the present class location? (MO.GOCLASS.CLASSLOCATESTUDY.R) (detail)*

192.605(b)(1) (192.609(a); 192.609(b); 192.609(c);
192.609(d); 192.609(e); 192.609(f))

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes
Does not apply to operator

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))

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | x | | | | |

Notes
Work orders for leak repairs and car damaging meter was reviewed no indication of any issues

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))

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | x | | | | |

Notes
Completed 6-8-2020 by Jeff Roberts Russmar

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)

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | x | | | | |

Notes
Meeting was conducted 12-14-2020

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)

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes
No incidents reported

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

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
Work orders reviewed

16. 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
Refer to pape

17. 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
Refer to pape

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
1988 record reviewed 125 psig and 40 psig

19. 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
Refer to pape

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

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
4 locations odor tests with instrument taken:

- City Building
- 3388 Merle Travis Hwy
- 925 union ridge road
- Two Rivers Hwy 70

2019 and 2020 Records reviewed
 11-1-2019 until 11-29-2020 test was taken 2 times a month by Dee Sims

21. 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
 Refer to pape

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
 Patrolling records report reviewed

4-3-2020, 5-29-2020, 7-24-2020, and 10-9-2020

Operator has some exposed plastic and steel lines. Recommend action plan to bury pipe

Beechmont ditch next to old dollar general 4inch steel line exposed 8 feet.

Union Ridge Road exposed 1 ¼ inch poly pipe 27 inch

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

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
Mailings sent
Due to covid no in person meeting

24. Leakage Surveys (detail) *Do records indicate leakage surveys conducted as required?* (PD.RW.LEAKAGE.R) (detail)

192.709(c) (192.706; 192.706(a); 192.706(b))

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes
No transmission

25. Other Languages (detail) *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
Refer to pape

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
Russmar conducted Leak Survey all gas lines and meters in Drakesboro
4-6-2020 until 5-28-2020 21 leaks were found
Leak Summary
Total Grade 1 -6
Total Grade 2 – 9
Total Grade 3- 6

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
Work orders reviewed pressure tests conducted new line installed

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

28. 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
Refer to pape

29. 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
Refer to pape

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
2020 records reviewed shut down old service cut and capped service lines

31. 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
Refer to pape

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
Regulator inspections conducted by Danny Shelley 8-10-2020
Contractor stated:
5 of 10 the regulators inspected are obsolete and no replacement parts are available. Contractor suggested to replace regulators.

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

33. Evaluating Program Effectiveness (detail) *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
Refer to pape

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
Regulator inspections conducted by Danny Shelley 8-10-2020
Contractor stated:
5 of 10 the regulators inspected are obsolete and no replacement parts are available. Contractor suggested to replace regulators

35. 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
Refer to pape

36. Valve Maintenance Transmission Lines (detail) *Do records indicate proper inspection and partial operation of transmission line valves that may be required during an emergency as required and prompt remedial actions taken if necessary? (MO.GM.VALVEINSPECT.R) (detail)*

192.709(c) (192.745(a); 192.745(b))

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes
No transmission

37. 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
Refer to pape

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

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
6 critical Valves operated and greased 5-15-2019 Dee Sims

6 critical valves operated and greased 8-18-2020 Marvin Anderson

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
Operator does not have vaults

40. 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
Refer to pape

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 on records

42. Measure Bottom-Line Results (detail) *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)

192.616(c) (API RP 1162 Section 8.4.4)

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | | x |

Notes
Refer to pape

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

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

44. Program Changes (detail) *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)

192.616(c) (API RP 1162 Section 2.7 (Step 12); API RP 1162 Section 8.5)

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | | x |

Notes
Refer to pape

45. Master Meter and Petroleum Gas Systems (detail) *Do records indicate the master meter or petroleum gas system operator has met the requirements of 192.616(j)?* (PD.PA.MSTRMETER.R) (detail)

192.616(j) (192.616(h); API RP 1162 Section 2.7 (Step 12); API RP 1162 Section 8.5)

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes
No master meter

Records - Operator Qualification

1. 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.OO.RECORDS.R) (detail)

192.807(b)

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | x | | | | |

Note
Midsouth Utility Services provided OQ Mike Jones and Donald Sims Jr.

Written Test 3-24-2020 and Field Exam 3-24-2020

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

192.807(a) (192.807(b))

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | x | | | | |

Notes
Russmar – and Martin OQ records reviewed

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

Work order reviewed

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

Pipe to soil readings conducted 8-20-2020 by Marvin Anderson All readings are below required -0.85 and is out of compliance.

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

2020 records reviewed Rectifier is on but not protecting pipeline

Need to add who performed inspection

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

Not indicated on records

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

Pipe to soil readings conducted 8-20-2020 by Marvin Anderson All readings are below required -0.85 and is out of compliance.

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

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.ELECISOLATE.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 to operator system at this time

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
Pipe to soil was taken at different locations

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 stray currents indicated

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
Operator does not transport corrosive gas

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
Work order pipe examined
Operator does not transport corrosive gas

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

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

Operator does not transport corrosive gas

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

Operator does not transport corrosive gas

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

2019 record reviewed
8-22-2019 Dee Sims

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

System has anodes and rectifier but not protecting system at this time

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

Operator does not transport corrosive gas

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 records indicate internal corrosion

Procedures (Distribution Compressor Station) - Compressor Station

1. Compressor Station Design/Construction - Maintenance (detail) *Does the process have sufficient detail for maintaining compressor stations, including provisions for isolating units or sections of pipe and for purging before returning to service? (FS.CS.CMPMAINT.P) (detail)*

192.605(b)(6)

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes

No compressors

2. Compressor Station Design/Construction - Start-Up and Shut-Down (detail) *Does the process for start-up and shut-down have sufficient detail to ensure start-up and shut-down of compressor units in a manner designed to assure operation within the MAOP limits prescribed by this part, plus the build-up allowed for operation of pressure-limiting and control devices? (FS.CS.CMPSUSD.P) (detail)*

192.605(b)(5) (192.605(b)(7))

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes

No compressors

3. Compressor Station Design/Construction - Pressure Relief (detail) *Does the process provide adequate detail for inspection and testing of compressor station pressure relief devices with the exception of rupture disks? (FS.CSSYSROT.CMPRELIEF.P) (detail)*

192.605(b)(1) (192.731(a); 192.731(b); 192.731(c))

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes

No compressors

4. Compressor stations - Storage of Combustible Materials (detail) *Does the process include requirements for the storage of flammable/combustible materials and specify that aboveground oil or gasoline storage tanks being installed at compressor stations be protected in accordance with NFPA No. 30, as required of §192.735(b)? (DC.COCMP.CMPCOMBUSTIBLE.P) (detail)*

192.303 (192.735(a); 192.735(b))

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes

No compressors

5. Compressor Station Design/Construction - Permanent Gas Detection (detail) *Does the process adequately detail requirements of permanent gas detectors and alarms at compressor buildings? (FS.CSSYSROT.CMPGASDETREQ.P) (detail)*

192.605(b) (192.736(b))

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes

No compressors

Field Review (Distribution Compressor Station) - Compressor Stations Inspection (Field)

1. Compressor Station Design/Construction - Exits (detail) *Does each main compressor building operating floor have at least two separated, easily accessed and unobstructed exits to a place of safety, main compressor building exits that have door latches that can be readily opened without a key, and main compressor building exit doors mounted to swing outward?* (FS.CS.BLDGEXITS.O) (detail)

192.163(c)

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes
No compressors

2. Compressor Station Design/Construction - Fence Gates (detail) *Do fenced areas around compressor stations have at least two gates that provide for easy escape to place of safety, and do gates located within 200 feet of any compressor plant open outward and able to be opened from the inside without a key when the station is occupied?* (FS.CS.FENCEGATES.O) (detail)

192.163(d)

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes
No compressors

3. Compressor Station Design/Construction - NFPA 70 (detail) *Are the proper permits and approvals authorized under NFPA 70 posted or otherwise located at the compressor station?* (FS.CS.CMPNFPA70.O) (detail)

192.163(e)

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes
No compressors

4. Compressor stations Liquid Removal (detail) *Are compressors protected from liquids and, as applicable, liquid separators for compressors installed, in accordance with 192.165?* (DC.DPCCMP.CMPLIQPROT.O) (detail)

192.141 (192.165(a); 192.615(b))

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes
No compressors

5. Compressor Station Design/Construction - ESD Gas Discharge (detail) *Does each compressor station have an emergency shutdown system that is capable of safely discharging blowdown gas from the blowdown piping at a location where the gas will not create a hazard?* (FS.CSSYSROT.ESDGASDISCH.O) (detail)

192.167(a)(2)

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes
No compressors

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

6. Compressor Station Design/Construction - ESD Gas Block (detail) Does each compressor station have an emergency shutdown system that is capable of blocking gas out of the station and blow down the station piping? NOTE: Not required for field compressor stations of 1,000 horsepower (746 kilowatts) or less. (FS.CSSYSROT.ESDGASBLK.O) (detail)

192.167(a)(1)

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes
No compressors

7. Compressor Station Design/Construction - ESD (detail) Does each compressor station have an emergency shutdown system that is capable of shutting down gas compressing equipment and gas fires in the vicinity of gas headers and compressor buildings? (FS.CSSYSROT.ESDGASSD.O) (detail)

192.167(a)(3)

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes
No compressors

8. Compressor Station Design/Construction - ESD Electrical (detail) Does each compressor station have an emergency shutdown system that is capable of shutting down electrical facilities (except emergency and equipment protection circuits) near gas headers and within compressor buildings? (FS.CSSYSROT.ESDELECSO.O) (detail)

192.167(a)(3)(i) (192.167(a)(3)(ii))

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes
No compressors

9. Compressor Station Design/Construction - ESD Locations (detail) Does each compressor station have an emergency shutdown system that is capable of being operated from at least two locations which are: 1) Outside the gas area of the station, 2) Near the exit gates, if the station is fenced, or near emergency exits, if not fenced, 3) And not more than 500 feet (153 meters) from the limits of the station? (FS.CSSYSROT.ESDLOCATION.O) (detail)

192.167(a)(4)

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes
No compressors

10. Compressor Station Design/Construction - Distribution Supply ESD (detail) Does each compressor station that supplies gas directly to a distribution system (with no other adequate sources of gas available) have an emergency shutdown system that will not function at the wrong time or cause unintended outages? (FS.CSSYSROT.ESDDISTSD.O) (detail)

192.167(b)

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes
No compressors

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

11. Compressor Station Design/Construction - Unattended Platform ESD (detail) *Does each unattended platform compressor station located offshore or in inland navigable waters have an emergency shutdown system that will actuate automatically in the event of the following occurrences? 1) When gas pressure equals the MAOP plus 15 percent and, 2) When an uncontrolled fire occurs on the platform. (FS.CSSYSROT.UNATTPLATCMPD.O) (detail)*

192.167(c)(1)

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes
No compressors

12. Compressor Station Design/Construction - Fire Protection (detail) *Do compressor stations have adequate fire protection facilities? (FS.CSSYSROT.CMPFP.O) (detail)*

192.171(a)

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes
No compressors

13. Compressor Station Design/Construction - Over-Speed Protection (detail) *Do compressor stations' prime movers other than electrical induction or synchronous motors have automatic shutdown devices that will prevent over-speed of the prime mover or the unit being driven? (FS.CSSYSROT.CMPOVSPD.O) (detail)*

192.171(b)

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes
No compressors

14. Compressor Station Design/Construction - Lubrication (detail) *Do compressor units have shutdown or alarm devices that will operate in the event of inadequate heating or lubrication? (FS.CSSYSROT.CMPLUBPROT.O) (detail)*

192.171(c)

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes
No compressors

15. Compressor Station Design/Construction - Gas Engine Shutdown (detail) *Are compressor station gas engines that operate with pressure gas injection equipped so that stoppage of the engine will result in the fuel being automatically shut off and the engine distribution manifold being vented? (FS.CSSYSROT.CMPGASENGSD.O) (detail)*

192.171(d)

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes
No compressors

16. Compressor Station Design/Construction - Gas Engine Mufflers (detail) *Are gas engines in compressor stations equipped with mufflers that prevent gas from being trapped in the muffler? (FS.CSSYSROT.CMPGASENGMFL.O) (detail)*

192.171(e)

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes
No compressors

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

17. Compressor Station Design/Construction - Ventilation (detail) *Are compressor station buildings ventilated to ensure employees are not endangered by accumulation of gas in enclosed areas? (FS.CS.CMPBLDGVENT.O) (detail)*

192.173

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes
No compressors

18. Cathodic Protection of Underground Piping (detail) *Are bare or coated pipes in compressor, regulator or meter stations installed before August 1, 1971 (except for cast and ductile iron lines) cathodically protected in areas where active corrosion was found in accordance with Subpart I or Part 192? (TD.CP.PRE1971.O) (detail)*

192.457(b)

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes
No compressors

19. 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
No compressors

20. Start-Stop Procedures (detail) *During startup or shut-in, is it assured that the pressure limitations on the pipeline were not exceeded? (DC.MO.MAOPLIMIT.O) (detail)*

192.605(b)(5)

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes
No compressors

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

192.605(b)(3)

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes
No compressors

22. Compressor Station - Emergency Response Plan (detail) *Are emergency response plans for selected compressor stations kept on site? (FS.CS.CMPERP.O) (detail)*

192.605(a) (192.615(b))

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes
No compressors

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

23. MAOP Recording (detail) *Do pressure recording charts or SCADA records indicate that maximum allowable operating pressure limits have been maintained in accordance with 192.619? (MO.GOMAOP.MAOPRECORDING.O) (detail)*

192.605(b)(1) (192.619(a); 192.619(c))

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes
No compressors

24. 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
No compressors

25. 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
No compressors

26. Compressor Station Design/Construction - Pressure Relief (detail) *Are pressure relief/limiting devices inside a compressor station designed, installed, and inspected properly? (FS.CSSYSROT.CMPRELIEF.O) (detail)*

192.199 (192.731(a); 192.731(b); 192.731(c))

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes
No compressors

27. Compressor stations - Storage of Combustible Materials (detail) *Are flammable/combustible materials stored as required and aboveground oil or gasoline storage tanks installed at compressor stations protected in accordance with NFPA No. 30, as required by 192.735(b)? (DC.COCMP.CMPCOMBUSTIBLE.O) (detail)*

192.735(a) (192.735(b))

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes
No compressors

28. Compressor Station Gas Detection (detail) *Have adequate gas detection and alarm systems been installed in selected applicable compressor buildings? (FS.CSSYSROT.CMPGASDET.O) (detail)*

192.736(a) (192.736(b))

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes
No compressors

Records (Distribution Compressor Station) - Compressor Station O&M Performance

1. Compressor Station Design/Construction - Pressure Relief (detail) *Do records document with adequate detail that all inspection and testing of compressor station pressure relief devices with the exception of rupture disks have occurred at the required interval? (FS.CSSYSROT.CMPRELIEF.R) (detail)*

192.709(b) (192.709(c); 192.731(a); 192.731(b); 192.731(c))

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes
No compressors

2. Compressor Station Design/Construction - Gas Detection (detail) *Do records document that all compressor station gas detection and alarm systems are being maintained and tested as required? (FS.CSSYSROT.CMPGASDETO.M.R) (detail)*

192.709(c) (192.736(c))

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes
No compressors

Instructions

1. Use in conjunction with Unit inspections
2. Interview the primary operator contact for the Unit inspection you are conducting and enter their responses. Do not request the operator substance abuse expert to provide responses to these questions.
3. Send completed form to stanley.kastanas@dot.gov

| | | | |
|--|---|-------------------------|---------------------|
| Name of Operator | City of Drakesboro | Op ID # | 3538 |
| Inspector | Melissa Holbrook | Unit # | |
| Date of Inspection | 11-25-2020 | | |
| Inspection Location City & State | Virtual Inspection | | |
| Operator Employee Interviewed | Drakesboro and Russmar submitted information via email | Phone # | 270-543-6425 |
| Position/Title | n/a | | |
| Operator Designated Employer Representative (DER), (a.k.a. Substance Abuse Program Manager) | | Mayor Mike Jones | |
| DER Phone # | 270-543-6425 | | |

| §199 | Pipeline Safety Regulations Drug and Alcohol Testing | Yes | No | Does Not Know |
|---|--|-----|----|---------------|
| .3, .101 .201, .245 | 1. Does the company have a plan for drug and alcohol testing of employees and contractors performing, or ready to perform, covered functions of operations, maintenance, and emergency response? | x | | |
| Comments | Refer to D&A plan | | | |
| .3 .105(c) .225(b) | 2. Does the company perform random drug testing and reasonable suspicion drug and alcohol testing of employees performing covered functions? For random drug testing, enter the number of times per year employees are selected and the number of employees in each selection in Comments below. | x | | |
| Comments | Need to add 50 % for phmsa in plan 2020 drug tests submitted | | | |
| .3 .105(b) | 3. Does the company conduct post-accident/incident drug and alcohol testing for employees who have caused or contributed to the consequences of an accident/incident? Enter the position/title of the employee who would make the decision to conduct post-accident/incident testing in Comments below. | x | | |
| Comments | Supervisor Mayor will ensure employee test after incident/accident | | | |
| .113(c) .117(a)(4) .227(b)(2) .241 | 4. Does the company provide training for supervisors on the detection of potential drug abuse (minimum 60 minutes) and alcohol misuse (minimum 60 minutes)? | x | | |
| Comments | Pg 6 completed by KLC 11-11-2020 | | | |
| .3 .113(b) .117(a)(4) .239(b)(11) | 5. Does the company give covered employees an explanation of the drug & alcohol policies and distribute information about the Employee Assistance Program, including a hotline number? Provide details in Comments below. | x | | |
| Comments | D&A plan includes EAP not in office to see numbers | | | |

Training and Qualification - Operator Qualification

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.OOPLAN.P) (detail)

192.805(a) (192.801(b))

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | x | | | | |

Notes

Sec 3 pg 4

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

Appendix C

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.OOPLANCONTRACTOR.P) (detail)

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

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | x | | | | |

Notes

Pg 2

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

Pg 2

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 |
|-------|-----|---------|-------|----|----|
| | | | | | |

Notes

Jeremy Janes, Marvin Anderson, Mark McGuire, records reviewed

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
Currently operator has no documented mutual assistance agreements.

Russmar a contractor is currently assisting operator with 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
Appendix C

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
Records indicate Mike Jones and Donald Sims Jr were qualified by Midsouth Utility Services

Written test and field exam 3-2020

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
The plan states aoc in definition Aoc are reviewed in each tasks.

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
No records indicate aoc's and no protocol 9 conducted due to covid

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.OO.RECORDS.R) (detail)

192.807

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | x | | | | |

Notes
Mike Jones and Donald Sims Jr oq qualified 3/24 & 25,2020 by Midsouth Corrosion control

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.OO.MERGERACQ.P) (detail)

192.805(b) (192.803)

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | | | | x | |

Notes
Not in plan a municipal gas operator

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.OO.TRAINING.P) (detail)

192.805(h)

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | x | | | | |

Notes
Sec 4

16. 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.OO.NONQUALIFIED.P) (detail)

192.805(c)

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | x | | | | |

Notes
Sec 5

17. 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.OO.PERFMONITOR.P) (detail)

192.805(d) (192.805(e))

| Sat + | Sat | Concern | Unsat | NA | NC |
|-------|-----|---------|-------|----|----|
| | x | | | | |

Notes
Sec 7

19. 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
Modification and mgt of change section

21. 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
Sec 8

22. 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
Sec 11

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

Due to Covid restrictions for field inspection was conducted

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

Due to Covid restrictions for field inspection was conducted

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

Due to Covid restrictions for field inspection was conducted

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

Due to Covid restrictions for field inspection was conducted

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

Due to Covid restrictions for field inspection was conducted

Distribution Integrity Management Program

Implementation Inspection Form

This inspection form is for the evaluation of an operator's implementation of its gas distribution integrity management program (DIMP) through a review of its records and actions performed on pipeline facilities. This inspection form is applicable to operators, other than Master Meter and Small LPG operators, that have developed and implemented a DIMP under §192.1005. The form asks inspectors to review records and perform field observations regarding the implementation of the DIMP required elements. Following a review of the operator's DIMP plan, inspectors will observe actions taken by the operator to ensure that procedures have been followed. There are instances when actions by an operator could be deemed satisfactory by an inspector for an implementation question while still not meeting the procedural requirements in the DIMP plan resulting in an unsatisfactory rating for a corresponding procedural question.

Questions with code references beside them are enforceable. "S/Y" stands for "satisfactory" or "yes"; "U/N" stands for "unsatisfactory" or "no"; "N/A" stands for "not applicable"; and "N/C" stands for "not checked". If an item is marked U/N, N/A, or N/C, an explanation must be included in the comments section. Due to the unique characteristics of some operator's system, there are instances where an operator is not required to perform an action, and some of the questions requesting a review of documents may not apply and would be rated as "N/A" (rather than rating "U/N"). For instance, in Question #8, if the operator has NOT acquired any new information relevant to threat identification, rate as "N/A". Correspondingly, if the operator had acquired new information that needed to be included in the threat identification and had not, then the rating would be "U/N".

This inspection form includes two types of activities – records review and field observation activities:

- The Records Review questions are to be performed on records used by an operator for implementing its DIMP plan. Not all parts of this form may be applicable to a specific Records Review Inspection, and only those applicable portions of this form need to be completed.
- The Field Observation questions are to be used on field activities being performed by an operator in support of its DIMP plan. Field Observation inspection activities may also include review of data, environmental conditions, and assumptions being used by an operator in support of its DIMP plan. Not all parts of this form may be applicable to a specific Field Observation Inspection, and only those applicable portions of this form need to be completed.

A review of applicable Operations and Maintenance (O&M) and DIMP processes and procedures applicable to the field activity being inspected should be considered by the inspector to ensure the operator is implementing its O&M Manuals and DIMP in a consistent manner.

PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014, Rev 0

Operator Contact and System Information

Operator Information:

| | |
|--------------------------------------|--|
| Name of Operator (legal entity): | Drakesboro Natural Gas |
| PHMSA Operator ID: | 3538 |
| Type of Operator: | <input type="checkbox"/> Investor Owned <input checked="" type="checkbox"/> Municipal <input type="checkbox"/> Private <input type="checkbox"/> LPG <input type="checkbox"/> Other (Identify - e.g., cooperative) |
| State(s) included in this inspection | KY |
| Headquarters Address: | P.O. Box 129 Drakesboro, KY 42337 |
| Company Contact: | Jeff Roberts – Russmar plan states Mayor Mike Jones Responsible |
| Phone Number: | 606-875-4655 |
| Email: | Jeff.roberts@russmarutilities.com |
| Date(s) of Inspection | 11-30-2020 |
| Date of this Report | 11-30-2020 |
| Date of Current DIMP Plan/Revision | 6-8-2020 |

Persons Interviewed:

| Persons Interviewed <i>(list primary contact first)</i> | Title | Phone Number | Email |
|--|---------|--------------|--|
| Jeff Roberts –via email | Russmar | 606-875-4655 | jeffroberts@rusmmarutilties.com |
| | | | |

State/Federal Representatives:

| Inspector Name and Agency | Phone Number | Email |
|---------------------------|--------------|--|
| Melissa Holbrook KY PSC | 502-229-7542 | Melissac.holbrook@ky.gov |
| | | |

System Description Narrative: *The City of Drakesboro was cited for not having a dimp plan meet requirements in 2019. The city hired a contractor to complete new plan dated 6-8-2020. Evaluation not due for 5 years.*

PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014, Rev 0

| Question Number | Rule § | Description | S/Y | U/N | N/A | N/C |
|--------------------|---|--|-------------------------------------|--------------------------|--------------------------|--------------------------|
| | | Issues Identified in previous Integrity Management Inspection(s) | | | | |
| 1 | * - If not satisfactory, insert appropriate code section(s) | Have all issues raised in previous DIMP inspections been satisfactorily addressed? Provide comments below. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector Comments | | Issues were cited in 2019 inspection for not having plan. Operator has developed plan as required. | | | | |
| | | 192.1005 | | | | |
| | | Knowledge of the system | | | | |
| 2 | .1007 (a)(3) | Is the operator collecting the missing or incomplete system information and data needed to fill knowledge gaps to assess existing and potential threats? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector Comments | | Operator needs to re-evaluate and look at corrosion threat again due to issues with rectifier | | | | |
| 3 | .1007 (a)(3) | Is the operator collecting the missing or incomplete system information and data using the procedures prescribed in its DIMP plan? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector Comments | | | | | | |
| 4 | .1007 (a)(3) | Has the operator incorporated into the DIMP plan any new or missing information identified or acquired during normal operations, maintenance, and inspection activities? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector Comments | | Operator needs to re-evaluate and look at corrosion threat again due to issues with rectifier | | | | |
| 5 | .1007(a)(5) | Has the operator captured required data on any new pipeline installations? For pipe, fittings, valves, EFVs, risers, regulators, shut-offs, etc., examples of data and records required to be collected by operator since August 2, 2011 include, but are not limited to, the following: <ul style="list-style-type: none"> • Location • Material type and size • Wall thickness or SDR • Manufacturer • Lot or production number | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

**PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014,
Rev 0**

| Question Number | Rule § | Description | S/Y | U/N | N/A | N/C |
|--------------------|-----------|---|-------------------------------------|--------------------------|--------------------------|--------------------------|
| Inspector Comments | | Due to personal changes many records were missing or not completed and was cited in 2019 inspection. | | | | |
| 6 | .1007 (a) | Are data collection forms used in conjunction with the operator's DIMP plan being fully and accurately completed? Note: This question can be answered by office review of records and/or comparison of field conditions to information in the reviewed records. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector Comments | | Records can only be confirmed for some of 2018, 2019 and 2020 | | | | |
| 7 | .1007 (a) | If new Subject Matter Experts (SMEs) input is incorporated into the DIMP plan, do SMEs have the necessary knowledge and/or experience (skills sets) regarding the areas of expertise for which the SME provided knowledge or supplemental information for input into the DIMP plan? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector Comments | | Jeff Roberts has been contracted to help with this due to lack of operator experience and training in gas industry | | | | |

PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014, Rev 0

| Question Number | Rule § | Description | S/Y | U/N | N/A | N/C |
|--------------------|-----------|---|-------------------------------------|--------------------------|--------------------------|--------------------------|
| 8 | .1007 (a) | <p>Do operator personnel in the field understand their responsibilities under DIMP plan? (Below are possible questions for field personnel)</p> <ul style="list-style-type: none"> • Would you explain what DIMP training you have received? • What instructions have you received to address the discovery of pipe or components not documented in the company records? • What instructions have you received if you find a possible issue? (ex: corrosion, dented pipe, poor fusion joints, missing coating, excavation damage, mechanical fitting failures) • If you find situations where the facilities examined (e.g., size of the pipe, coating) are different than records indicate, what documentation do you prepare? • If you are repairing a leak and find that a fitting was improperly installed, what documentation do you prepare? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector Comments | | Due to inexperience and training of drakesboro employees russmar is assisting with this issue. | | | | |

PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014, Rev 0

| Question Number | Rule § | Description | S/Y | U/N | N/A | N/C |
|--------------------|-----------------------------|---|-------------------------------------|--------------------------|--------------------------|--------------------------|
| | 192.1007 (b) and (c) | Identify Threats; Evaluate and Rank Risk | | | | |
| 9 | .1007(b) | Has the operator acquired any new information relevant to system knowledge that may affect its threat identification? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector Comments | | Due to personal change items are added as maint is conducted and pipe exposure. | | | | |
| 10 | .1007 (b) | Have any changes occurred that require re-evaluation of threats and risks? Examples include, but are not limited to, the following: <ul style="list-style-type: none"> • Acquisition of new systems • Completion of pipe replacement program • New threats (e.g., first time natural forces damage, etc.) • Increase in existing threats (e.g., washouts, land subsidence, etc.) • Increase in consequences (e.g., new wall-to-wall pavement, etc.) • Organization changes (e.g., downsizing of staff, company restructuring, etc.) • Applicable code revisions • Other (describe below) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector Comments | | The corrosion threats need to be re-evaluated | | | | |
| 11 | .1007 (b) | 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? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector Comments | | Kga- russmar | | | | |
| 12 | .1007 (c) | Since the last DIMP plan review by the regulatory agency, has the operator updated its threat identification and risk assessment based on newly acquired information or data (see Questions 9, 10, and 11) relevant to system knowledge? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector Comments | | | | | | |

**PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014,
Rev 0**

| Question Number | Rule § | Description | S/Y | U/N | N/A | N/C |
|--------------------|-----------------------------|---|-------------------------------------|--------------------------|--------------------------|--------------------------|
| | 192.1007 (b) and (c) | Identify Threats; Evaluate and Rank Risk | | | | |
| 13 | .1007 (c) | If the operator has modified its threat identification and risk evaluation and ranking, were the revisions made in accordance with the procedure in the operator's DIMP plan? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector Comments | | The operator needs to re-evaluate corrosion | | | | |
| 14 | .1007 (c) | Does the operator's 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 its system? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector Comments | | | | | | |
| 15 | .1007 (c) | Has the operator added or modified system subdivisions within its risk evaluation and ranking since the last plan review by the regulatory agency? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector Comments | | | | | | |
| 16 | .1007 (c) | If the operator has added or modified system subdivisions, was it done in accordance with the procedures described in the operator's DIMP plan? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector Comments | | | | | | |
| 17 | .1007 (c) | If the operator has added or modified system subdivisions, did the new system subdivision result in modifications to the risk evaluation and ranking? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector Comments | | | | | | |

PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014, Rev 0

| Question Number | Rule § | Description | S/Y | U/N | N/A | N/C |
|-----------------|--------------------|---|-------------------------------------|-------------------------------------|--------------------------|--------------------------|
| | 192.1007(d) | Identify and implement measures to address risks | | | | |
| 18 | .1007 (d) | Does the documentation reviewed demonstrate the operator is implementing the measures to reduce risks per the DIMP plan? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| | | Operator has a rectifier issue and system is not currently properly protected with anodes. The operator needs to address cathodic protection issues. | | | | |
| 19 | .1007 (d) | Has the operator completed any measures to reduce risks resulting in the elimination/mitigation of the associated identified threat? (e.g., pipe replacement program completed, etc.) | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| | Inspector Comments | Operator is trying to get funds to replace pipe with plastic or replace cathodic protection a current order is not been sent from psc at this time. At this time do not know what operator is going to do. | | | | |
| 20 | .1007 (d) | If answering "Satisfactory/Yes" to question 19, has the operator re-evaluated and ranked its risks (1007(c)) because of the elimination/mitigation of an identified threat to ensure that risk reduction measures in place are appropriate? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| | Inspector Comments | Operator needs to look at cathodic protection issue and address in dimp plan | | | | |
| 21 | .1007 (d) | Does each implemented risk reduction measure identified in the DIMP plan address a specific risk? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| | Inspector Comments | Operator needs to look at cathodic protection issue and address in dimp plan | | | | |

PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014, Rev 0

| | | | | | | |
|--------------------|-----------|--|-------------------------------------|--|--------------------------|--------------------------|
| 22 | .1007 (d) | <p>Can the operator provide documentation to demonstrate that an effective leak management program is being implemented? Important components in an effective program include, but are not limited to, the following: <u>Locate</u> the leaks in the distribution system; <u>Evaluate</u> the actual or potential hazards associated with these leaks; <u>Act</u> appropriately to mitigate these hazards; <u>Keep</u> records; and <u>Self-assess</u> to determine if additional actions are necessary to keep people and property safe. Answer "N/A" if operator repairs all leaks when found.</p> | <input checked="" type="checkbox"/> | | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector Comments | | Operator has conducted 2020 leak survey | | | | |

PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014, Rev 0

| Question Number | Rule § | Description | S/Y | U/N | N/A | N/C |
|--------------------|-------------|---|-------------------------------------|--------------------------|--------------------------|--------------------------|
| | 192.1007(e) | Measure performance, monitor results, and evaluate effectiveness | | | | |
| 23 | .1007 (e) | <p>Is the operator collecting data for the required performance measures in §192.1007(e)?</p> <p>i) Number of hazardous leaks either eliminated or repaired, categorized by cause? <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p> <p>ii) Number of excavation damages? <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p> <p>iii) Number of excavation tickets? <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p> <p>iv) Total number of leaks either eliminated or repaired, categorized by cause? <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p> <p>v) Number of hazardous leaks either eliminated or repaired, categorized by material? (Note: Not required in PHMSA Distribution Annual Report Form 7100.1-1) <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p> <p>vi) Any additional measures the operator determines are needed to evaluate the effectiveness of the DIMP plan in controlling each identified threat? (Note: Not required in PHMSA Distribution Annual Report Form 7100.1-1) <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p> | | | | |
| Inspector Comments | | Russmar and Operator obtains information for 7100 report | | | | |
| 24 | .1007 (e) | Based on field observations and/or record reviews, is the operator accurately collecting the data used to measure performance in accordance with the procedures in its DIMP plan? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector Comments | | Records reviewed no field observation due to covid | | | | |
| 25 | .1007 (e) | Is the operator monitoring each performance measure from an established baseline? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector Comments | | The baseline would be from 2019 and future due to unaccounted records | | | | |
| 26 | .1007 (e) | Is each performance measure added since the DIMP plan was last updated tied to a specific risk reduction measure or group of measures? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector Comments | | | | | | |

PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014, Rev 0

| Question Number | Rule § | Description | S/Y | U/N | N/A | N/C |
|--------------------|--------------------|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| | 192.1007(f) | Periodic Evaluation and Improvement | | | | |
| 27 | .1007 (f) | Has the operator performed a periodic evaluation of its DIMP plan 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". | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Inspector Comments | | The complete assessment is not due until 2025. But the plan needs to be re-evaluated in 2021 for cathodic protection issues | | | | |
| 28 | .1007 (f) | Did the periodic evaluation include the following: <ul style="list-style-type: none"> • Verification of general system information (e.g., contact information; form names; action schedules, etc.)? • New information acquired since the previous evaluation? • Review of threats and risks? • Was the risk model re-run? • Review of performance measures? • Review of measures to reduce risks? • Evaluation of the effectiveness of measures to reduce risks? • Modification of measures to reduce risks, if necessary? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Inspector Comments | | The complete assessment is not due until 2025. But the plan needs to be re-evaluated in 2021 for cathodic protection issues | | | | |
| 29 | .1007 (e) | If any established performance measures indicated an increase in risk beyond an acceptable level (as established in the DIMP plan), did the operator implement new risk reduction measures along with their associated performance measures? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Inspector Comments | | The complete assessment is not due until 2025. But the plan needs to be re-evaluated in 2021 for cathodic protection issues | | | | |
| 30 | .1007 (f) | If the periodic evaluation indicates that <u>implemented measures to reduce risks</u> are NOT effective, were risk reduction measures modified, deleted or added? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014, Rev 0

| Question Number | Rule § | Description | S/Y | U/N | N/A | N/C |
|--------------------|---------------------|---|-------------------------------------|--------------------------|-------------------------------------|--------------------------|
| Inspector Comments | | The complete assessment is not due until 2025. But the plan needs to be re-evaluated in 2021 for cathodic protection issues | | | | |
| 31 | .1007 (f) | <p>Did the periodic evaluation indicate that the selected <u>performance measures</u> are assessing the effectiveness of risk reduction measures?</p> <p>If not, were performance measures modified, deleted or added? (describe in Inspector comments)</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Inspector Comments | | The complete assessment is not due until 2025. But the plan needs to be re-evaluated in 2021 for cathodic protection issues | | | | |
| 32 | .1007 (f) | Did the operator follow its procedures in conducting periodic evaluation and program improvement? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Inspector Comments | | The complete assessment is not due until 2025. But the plan needs to be re-evaluated in 2021 for cathodic protection issues | | | | |
| | 192.1007 (g) | Report results | | | | |
| 33 | .1007(g) | Did the operator complete Parts C and D of the PHMSA Distribution Annual Report (Form 7100.1-1) in its submission to PHMSA and the state regulatory authority having jurisdiction, if required, for each year since the last inspection? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector Comments | | No issues indicated | | | | |
| | 192.1009 | What must an operator report when mechanical fittings fail? | | | | |
| 34 | .1009 | Has the operator maintained accurate records documenting mechanical fitting failures resulting in hazardous leaks? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector Comments | | No issues indicated | | | | |

**PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014,
Rev 0**

| Question Number | Rule § | Description | S/Y | U/N | N/A | N/C |
|--------------------|--------|---|-------------------------------------|--------------------------|--------------------------|--------------------------|
| 35 | .1009 | <p>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?</p> <p>Did the reports contain the information required by Department of Transportation Form PHMSA F-7100.1-2?</p> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector Comments | | | | | | |
| 36 | .1009 | <p>Did the operator follow its procedure(s) for collecting the appropriate information and submitting PHMSA Form F-7100.1-2? Methods to verify include, but are not limited to, the following:</p> <ul style="list-style-type: none"> • Field observation of the excavation of a failed mechanical fitting • Examination of failed fittings or photographs that have been retained by the operator • Interview with field personnel responsible for collecting information | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector Comments | | | | | | |

**PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014,
Rev 0**

| Question Number | Rule § | Description | S/Y | U/N | N/A | N/C |
|--------------------|-----------------|---|--------------------------|-------------------------------------|-------------------------------------|--------------------------|
| | 192.1011 | What records must an operator keep? | | | | |
| 37 | .1011 | Is the operator retaining the records demonstrating compliance with Subpart P, as specified in its DIMP plan, for 10 years (or since 08/02/2011)? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector Comments | | The operator was cited for records missing and dimp plan inadequate Personal changes caused loss of records and work not completed | | | | |
| 38 | .1011 | Did the operator retain for 10 years (or since 08/02/2011) copies of superseded DIMP plans? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector Comments | | The operator was cited for records missing and dimp plan inadequate Personal changes caused loss of records and work not completed | | | | |
| 39 | .1011 | Did the operator follow its DIMP procedures applicable to records retention? If answered "Unsatisfactory/No", then list those procedures not followed below. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector Comments | | The operator was cited for records missing and dimp plan inadequate Personal changes caused loss of records and work not completed | | | | |
| | 192.1013 | When may an operator deviate from required periodic inspections under this part? | | | | |
| 40 | .1013 (c) | Has the operator received approval from PHMSA or the appropriate State Regulatory Authority for alternate (less strict than code) periodic inspection intervals? (If no, mark questions 40-44 "N/A") | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Inspector Comments | | Does not apply to operator | | | | |
| 41 | .1013 (c) | Has the operator conducted the periodic inspections at the specified alternate intervals? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Inspector Comments | | Does not apply to operator | | | | |
| 42 | .1013 (c) | Has the operator complied with all conditions that were required as part of the alternate inspection interval approval? If answered "Unsatisfactory/No", then provide comments below. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014, Rev 0

| Question Number | Rule § | Description | S/Y | U/N | N/A | N/C |
|--------------------|-----------|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| Inspector Comments | | Does not apply to operator | | | | |
| 43 | .1013 (c) | Do performance measure records indicate that an equal or greater overall level of safety has been achieved since the alternate inspection frequency was implemented? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Inspector Comments | | Does not apply to operator | | | | |
| 44 | .1013 (c) | If that an equal or greater overall level of safety has not been achieved, is the operator taking corrective action? Provide comments below regarding corrective actions taken or lack thereof. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Inspector Comments | | Does not apply to operator | | | | |

Additional Inspector Comments: The dimp plan was cited not adequate in last inspection. The operator did not have 10 years' worth of records due to personal not completing work and records missing. Questions 37-39 unsat/no Due to records. The city of drakesboro needs to address the cathodic protection issues on steel mains and services and implement remedial measures in dimp plan.

NTSB SUPPLEMENTAL INSPECTION QUESTIONS

| 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: Operator has no cast iron | | | | |
| Does the operator have procedures for surveillance of cast iron pipelines? Operator has no cast iron | | | 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: Operator has 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: EP-pg 24 | | | | |
| 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: Records 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: Russmar has written procedures when needed | | | | |
| 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: damage prevention plan reviewed | | | | |
| 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: PSC recommends operator to adopt CGA best practices. PSC has sent a copy of practices to City of Drakesboro. | | | | |

| | | | | |
|---|---|--|--|--|
| 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: work orders reviewed | | | | |

| PLASTIC PIPE DEFECTS/LEAKS | | | | |
|--|------------|-----------|------------|------------|
| SUPPLEMENTAL INSPECTION QUESTIONS | Yes | No | N/A | N/C |
| 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 with plastic pipe | | | | |

| PERMALOCK MECHANICAL TAPPING TEE ASSEMBLIES | | | | |
|--|------------|-----------|------------|------------|
| SUPPLEMENTAL INSPECTION QUESTIONS | Yes | No | N/A | N/C |
| Does the operator use PermaLock Mechanical Tapping Tee Assemblies? If yes, are they experience any issues with these type of installations? | x | | | |
| Comments: Operator are using perma lock tapping tees but not honey well brand No issues indicated, Operator was emailed NTSB report to review with employees. | | | | |
| Are they using best practices recommended by the manufacturer in their O&M Manual and/or distribution integrity management programs? | x | | | |
| Comments: Russmar- Jeff Roberts has reviewed perma lock with Dee Sims. Perma lock is in O&M Sec 23 | | | | |
| Are they using the specified tools and methods to correctly install these Assemblies? | x | | | |
| Comments: O&M Sec 23 Operator is using directions included in packet provided by manufacture per Jeff Roberts. | | | | |

| OPERATOR PROCEDURES FOR CONSIDERING LOW PRESSURE SYSTEMS IN THREAT ANALYSIS | | | | |
|---|------------|-----------|------------|------------|
| SUPPLEMENTAL INSPECTION QUESTIONS | Yes | No | N/A | N/C |
| Does the operator include low pressure systems in DIMP Plan? | | | x | |
| Comments: Operator does not have low pressure system | | | | |
| Does the operator have procedures for considering low pressure distribution systems in threat analysis? | | | x | |
| Comments: Operator does not have low pressure system | | | | |

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: Operator has no meters or regulators inside | | | | |

TRANSMISSION ONLY

| SUPPLEMENTAL INSPECTION QUESTIONS | Yes | No | N/A | N/C |
|---|-----|----|-----|-----|
| If transmission, has operator submitted information into National Pipeline Mapping System (NPMS) database along with any changes made after original submittal? | | | x | |
| Comments: not required in transmission | | | | |
| Does operator have any reversal flows, product changes, conversion of service? (ADB-2014-0040) | | | x | |
| Comments: does not apply to operator | | | | |

Public Awareness Program Effectiveness

| 1. Public Education Program (detail) <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 | | | | |
| Notes Current plan 5-23-2019 | | | | | | |

| 2. Management Support of Public Awareness Program (detail) <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 | | | | |
| Notes pg 2 | | | | | | |

| 3. Asset Identification (detail) <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 | | | | |
| Notes Sec 2 | | | | | | |

| 4. Audience Identification (detail) <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 | | | | |
| Notes Sec 3 | | | | | | |

| 5. Audience Identification Records (detail) <i>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)</i> | | | | | | |
|--|-------|-----|---------|-------|----|----|
| 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 Mailing were sent | | | | | | |

| 6. Messages, Delivery Methods, and Frequencies (detail) <i>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)</i> | | | | | | |
|--|-------|-----|---------|-------|----|----|
| 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 Sec 3 | | | | | | |

| 7. Consideration of Supplemental Enhancements (detail) <i>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)</i> | | | | | | |
|--|-------|-----|---------|-------|----|----|
| 192.616(c) (API RP 1162 Section 6.2) | Sat + | Sat | Concern | Unsat | NA | NC |
| | | X | | | | |
| Notes Sec 4 | | | | | | |

| 8. Educational Provisions (detail) <i>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)</i> | | | | | | |
|--|-------|-----|---------|-------|----|----|
| 192.616(d) (192.616(f)) | Sat + | Sat | Concern | Unsat | NA | NC |
| | | X | | | | |
| Notes Brochure provided per email was hard to read scanned copy appears to meet requirements. | | | | | | |

| 9. Messages on Pipeline Facility Locations (detail) <i>Were messages developed and delivered to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations? (PD.PA.LOCATIONMESSAGE.R) (detail)</i> | | | | | | |
|---|-------|-----|---------|-------|----|----|
| 192.616(e) (192.616(f)) | Sat + | Sat | Concern | Unsat | NA | NC |
| | | X | | | | |
| Notes | | | | | | |

| 10. Baseline Message Delivery Frequency (detail) <i>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)</i> | | | | | | |
|---|-------|-----|---------|-------|----|----|
| 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 Records appear to show message delivered February 2020 and November 2020 | | | | | | |

| 11. Liaison with Public Officials (detail) <i>(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)</i> | | | | | | |
|---|-------|-----|---------|-------|----|----|
| 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 Meeting was conducted 12-14-2020 | | | | | | |

| 12. Other Languages (detail) <i>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)</i> | | | | | | |
|---|-------|-----|---------|-------|----|----|
| 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) <i>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?</i> (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 , information printed in English | | | | | | |

| 14. Evaluation Plan (detail) <i>Does the program include a process that specifies how program implementation and effectiveness will be periodically evaluated?</i> (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 1 | | | | | | |

| 15. Evaluate Program Implementation (detail) <i>Has an audit or review of the operator's program implementation been performed annually since the program was developed?</i> (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 PSC gas inspection in 2019 operator was cited for no pap and not sending messages Operator will need to send surveys for public awareness program evaluation in 2021 | | | | | | |

| 16. Acceptable Methods for Program Implementation Audits (detail) <i>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?</i> (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 PSC gas inspection in 2019 operator was cited for no pap and not sending messages Operator will need to send surveys for public awareness program evaluation in 2021 Russmar was hired to complete plan. Drakesboro is currently doing the mailings and psc will inspect every year. | | | | | | |

| 17. Program Changes and Improvements (detail) <i>Were changes made to improve the program and/or the implementation process based on the results and findings of the annual audit(s)?</i> (PD.PA.PROGRAMIMPROVE.R) (detail) | | | | | | |
|--|-------|-----|---------|-------|----|----|
| 192.616(c) (API RP 1162 Section 8.3) | Sat + | Sat | Concern | Unsat | NA | NC |
| | | | | | X | |
| Notes Operator will complete evaluation in 2021 | | | | | | |

| 18. Evaluating Program Effectiveness (detail) (presented above) <i>Have effectiveness evaluation(s) of the program been performed for all stakeholder groups in all notification areas along all systems covered by the program?</i> (PD.PA.EVALEFFECTIVENESS.R) (detail) | | | | | | |
|--|-------|-----|---------|-------|----|----|
| 192.616(c) (API RP 1162 Section 8.4) | Sat + | Sat | Concern | Unsat | NA | NC |
| | | | | | X | |
| Notes Operator will complete evaluation in 2021 | | | | | | |

| 19. Measure Program Outreach (detail) <i>In evaluating effectiveness, was actual program outreach for each stakeholder audience tracked?</i> (PD.PA.MEASUREOUTREACH.R) (detail) | | | | | | |
|--|-------|-----|---------|-------|----|----|
| 192.616(c) (API RP 1162 Section 8.4.1) | Sat + | Sat | Concern | Unsat | NA | NC |
| | | | | | X | |
| Notes Operator will complete evaluation in 2021 | | | | | | |

| 20. Measure Understandability of Message Content (detail) <i>In evaluating program effectiveness, was the percentage of each stakeholder audience that understood and retained the key information from the messages determined?</i> (PD.PA.MEASUREUNDERSTANDABILITY.R) (detail) | | | | | | |
|---|-------|-----|---------|-------|----|----|
| 192.616(c) (API RP 1162 Section 8.4.2) | Sat + | Sat | Concern | Unsat | NA | NC |
| | | | | | X | |
| Notes Operator will complete evaluation in 2021 | | | | | | |

| 21. Measure Desired Stakeholder Behavior (detail) <i>In evaluating program effectiveness, was evaluation made of whether appropriate preventive, response, and mitigative behaviors were understood and likely to be exhibited?</i> (PD.PA.MEASUREBEHAVIOR.R) (detail) | | | | | | |
|---|-------|-----|---------|-------|----|----|
| 192.616(c) (API RP 1162 Section 8.4.3) | Sat + | Sat | Concern | Unsat | NA | NC |
| | | | | | X | |
| Notes Operator will complete evaluation in 2021 | | | | | | |

| 22. Measure Bottom-Line Results (detail) <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 | |
| Notes Operator will complete evaluation in 2021 | | | | | | |

| 23. Program Changes (detail) <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 | |
| Notes Operator will complete evaluation in 2021 | | | | | | |

*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, KENTUCKY 42345