

**2013 South Dakota Pipeline Safety Inspection  
Summary of Deficiencies**

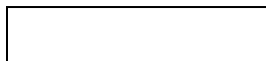
**Operator: Crooks Municipal Gas**

**Inspection Types: O&M Plan Inspection, Records Inspection, OQ Field Inspection and Field Inspection (pipeline markers and cathodic)**

**Inspection Dates: April 9, May 9, & May 22, 2013**

**Notices of Probable Violation**

Code Section	Code Description	Deficiency Noted	Proposed Correction Due Date	Penalty Proposed	Maximum Allowable Penalty	Compliance Order Proposed
§192.723(b)(2)	Does the operator conduct leakage surveys (to include manholes/cracks in pavement/other pertinent locations) of the distribution system outside of the principal business areas at intervals not exceeding 63 months, but at least once every 5 calendar year?	The leak survey conducted in 2008 was completed on 4/4/08. Therefor that segment of piping has not been leak surveyed within the past five years as required.	8/24/13	\$2,756  Calculated 7-16-13 by NDS	\$100,000	Crooks must hire additional qualified help in the areas of gas technician and DOT compliance  Added by NDS on 7-16-13
192.801 OQ	(a) This subpart prescribes the minimum requirements for operator qualification of individuals performing covered tasks on a pipeline facility. (b) For the purpose of this subpart, a covered task is an activity, identified by the operator, that:  (1) Is performed on a pipeline facility; (2) Is an operations or maintenance task; (3) Is performed as a requirement of this part; and (4) Affects the operation or integrity of the pipeline.	PEF192-1414.04 Pipe Shutdown/Startup/Pressure Change: Operating Identified Valve(s) was not completed until 5/23/13.  This task should have been identified as a covered task and qualifications completed prior to 1/1/13 when Northwestern Energy discontinued their contract for emergency response.	8/24/13	\$3,085  Calculated 7-16-13 by NDS	\$100,000	Crooks must hire additional qualified help in the areas of gas technician and DOT compliance  Added by NDS on 7-16-13
192.707	(a) Buried pipelines. Except as	Phone numbers were not updated by	8/24/13	\$3,414	\$100,000	Crooks must



Pipeline Markers	<p>provided in paragraph (b) of this section, a line marker must be placed and maintained as close as practical over each buried main and transmission line:</p> <p>(1) At each crossing of a public road and railroad; and</p> <p>(2) Wherever necessary to identify the location of the transmission line or main to reduce the possibility of damage or interference.</p>	<p>1/1/13 as required in 22 locations. There were also 2 warning signs missing. These corrections have been made.</p> <p>Pipeline markers need to be added at the following locations:</p> <ol style="list-style-type: none"> <li>1. 258<sup>th</sup> St &amp; Ditch Rd</li> <li>2. South of Hwy 115 &amp; 258<sup>th</sup> St</li> <li>3. Hwy 115 &amp; 84<sup>th</sup> St</li> <li>4. Ashland &amp; 84<sup>th</sup> St</li> <li>5. Hwy 115 &amp; Concord Dr.</li> <li>6. Hwy 115 &amp; Northview</li> <li>7. Hwy 115 &amp; Fredrick</li> <li>8. Hwy 115 &amp; 256<sup>th</sup> St</li> </ol>		<p>Calculated 7-16-13 by NDS</p>		<p>hire additional qualified help in the areas of gas technician and DOT compliance</p> <p>Added by NDS on 7-16-13</p>
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**Warnings**

Code Section	Code Description	Deficiency Noted	Warning	Proposed Correction Due Date
§191.22(a) & §191.22(b)	Has an operator ID been obtained or verified? (OPID)	Missed required date but has been completed. Completed 11/30/12.	Crooks Municipal Gas may be in violation of the code section listed in the first column. The city is advised to correct this or be subject to an enforcement action.	8/24/13
§192.615(b)(2)	(a) Training appropriate employees as to the requirements of the emergency plan.	Emergency response training has not been documented. Email sent by GB on 6/25/13 indicates training was completed 5/23/13. Issues closed per MZ on 7/8/13.	Crooks Municipal Gas may be in violation of the code section listed in the first column. The city is advised to correct this or be subject to an enforcement action.	8/24/13
§192.615(b)(3)	Review activities following actual or simulated emergencies to determine if they are effective. Does facility have the review and its outcome documented within their records?	No simulations have been document. Email sent by GB on 6/25/13 indicates review of possible scenarios was completed 5/23/13. Issues closed per MZ on 7/8/13.	Crooks Municipal Gas may be in violation of the code section listed in the first column. The city is advised to correct this or be subject to an enforcement action.	8/24/13
§192.225(b).	Has each welding procedure been recorded in detail, including the results of the qualifying tests?	NWE procedures are in the book but they are not authorized to use the NWE standards. They do not have the results of the qualifying test.	Crooks Municipal Gas may be in violation of the code section listed in the first column. The city is advised to correct this or be subject to an	8/24/13

**Warnings**

Code Section	Code Description	Deficiency Noted	Warning	Proposed Correction Due Date
			enforcement action.	
192.283	Does operator have copies of the destructive tests used to qualify the joining procedures? (yes or no)	Operator has continued to use NWE procedures but does not have the destructive testing documentation for the qualification. Revised joining procedures must be obtained and utilized.	Crooks Municipal Gas may be in violation of the code section listed in the first column. The city is advised to correct this or be subject to an enforcement action.	8/24/13

**Notices of Concern**

Code Section	Code Description	Comment
§192.459	When the operator has knowledge that any pipeline is exposed, is the exposed pipe examined for: (a) Evidence of corrosion? (b) Coating deterioration?	Ensure that forms are completely filled out including the coating and pipe condition.
§192.475(a)	Is gas tested to determine corrosive properties?	Need to maintain information from Northern Natural regarding properties of the gas. Information can be accessed by going to NorthernNaturalGas.com and selecting "Gas Quality" under "Informational Posting".
§192.625(b)	Odorization Method –	Operator should get information on odorizer. Currently operator has no information if problems should occur.
§192.723(b)(2)	Does the operator conduct leakage surveys (to include manholes/cracks in pavement/other pertinent locations) of the distribution system outside of the principal business areas at intervals not exceeding 63 months, but at least once every 5 calendar year?	Maps need to be reviewed to ensure that all areas are included in the survey. No map was included in 2012 survey. Suggest reviewing all leak surveys to ensure that entire system is covered and planned for future years.