



Gary Hanson, Chairperson  
Chris Nelson, Vice Chairperson  
Kristie Fiegen, Commissioner

*South Dakota*

**PUBLIC UTILITIES COMMISSION**

500 East Capitol Avenue  
Pierre, South Dakota 57501-5070  
www.puc.sd.gov

Capitol Office  
(605) 773-3201  
1-866-757-6031 fax

Grain Warehouse  
(605) 773-5280  
(605) 773-3225 fax

Consumer Hotline  
1-800-332-1782

February 28, 2014

The Honorable Ritchy Griep  
Mayor, City of Humboldt  
404 S. Madison  
Humboldt, SD 57035

RE: South Dakota 2014 Records Inspection of Garretson Natural Gas Utilities

Dear Mayor Griep:

This letter and attachments summarize the findings of the Records inspection, in reference to the Humboldt natural gas facilities. I would like to thank Daryl Sieverding for meeting with Boice Hillmer and I, and providing the required information.

The findings from the inspections are summarized into the following categories in the attached Summary of Deficiencies form.

1. **Notices of Probable Violation** – are issued if the inspector has good cause to believe a serious or repeat violation of the pipeline safety regulations has occurred. Notices of Probable Violation can also include monetary penalties of up to \$100,000 per day of violation and may include specific corrective actions that must be taken to correct the situation within a specific time frame and to come into compliance with the pipeline safety regulations.
2. **Warnings** – are issued for first time or less serious violations of the pipeline safety regulations. Warnings may include specific corrective actions that must be taken to correct the situation within a specific time frame and to come into compliance with the pipeline safety regulations.
3. **Notices of Concern** – are issued where no direct violation of the pipeline safety regulations exists and for informational purposes to aid the operator in managing as safe and effective pipeline as possible. Notices of Concern are also used to denote areas where best industry practices are not being followed. No action is required for Notices of Concern.

The completed inspection forms have also been enclosed that will include additional details such as inspection notes and the inspection issue corrections made prior to the issuance of this report.

**You must respond to the warnings listed in the Summary of Deficiencies form within 30 business days from the date this letter is received.** Please indicate in your response either agreement with each warning and requirement along with the proposed correction date or whether the issue is disputed. Failure to respond is considered agreement.

Please note the inspection conducted is limited to the specified code sections in the attached inspection forms. The South Dakota Public Utilities Commission (SDPUC) did not examine overall system condition or operability and does not warrant the same under any condition. Other system or code compliance issues may exist.

Failure to include such items in this report does not prohibit future SDPUC action nor limit applicability in future inspections.

Please do not hesitate to contact me with any questions or concerns regarding this inspection.

Sincerely,

A handwritten signature in black ink that reads "Mary Zanter". The signature is written in a cursive, flowing style.

Mary Zanter

Pipeline Safety Program Manager

CC: Daryl Sieverding, City of Humboldt, [finance@humboldtsd.com](mailto:finance@humboldtsd.com)  
Boice Hillmer, SDPUC, [boice.hillmer@state.sd.us](mailto:boice.hillmer@state.sd.us)

Attachments

**2014 South Dakota Pipeline Safety Inspection**  
**Summary of Deficiencies**  
**Operator: Humboldt Municipal Gas Utility**  
**Inspection Types: Records Inspection**  
**Inspection Dates: 2-10-2014**

**Notices of Probable Violation**

Code Section	Code Description	Deficiency Noted	Proposed Correction Due Date	Penalty Proposed	Maximum Allowable Penalty	Compliance Order Proposed

**Warnings**

Code Section	Code Description	Deficiency Noted	Warning	Proposed Correction Due Date
192.225(b)	Has each welding procedure been recorded in detail, including the results of the qualifying tests?	Welding procedures are generic guidance with no specific weld procedure established. If work needs to occur on the steel system a weld procedure will need to be established. Operator should establish appropriate weld procedures.	Humboldt 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.	May 28 <sup>th</sup> 2014
192.285(a)(1) 192.285(a)(2) and 192.285(c)	Does operator have copies of employee training dates and type of join training for each employee? (yes or no)	Cannot find Daryl's OQ for 2013 but recorded that it was done 3/1/13.	Humboldt 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.	May 28th 2014
§192.743	Does the operator perform and document inspections on relief devices not to exceed 15 months but at least once each calendar year to determine the following?	Calculations are missing for 2013.	Humboldt 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.	May 28th 2014

**Notices of Concern**

Code Section	Code Description	Comment

**Notices of Concern**

Code Section	Event Description	Comment



**PIPELINE SAFETY RECORDS INSPECTION CHECKLIST**

2014  
South Dakota Public Utilities Commission

<b>Operator Evaluated</b>	Humboldt Municipal Gas		
<b>Operator IOCS ID</b>	30964		
<b>Inspection Unit IOCS ID</b>			
<b>Unit Description</b>	11 mile steel pipeline feeding the city of Humboldt and the plastic distribution system in Humboldt.		
<b>Portions of Unit Inspected</b>	100 % of records covered in this form.		
<b>Contact Person / Title (person interviewed)</b>	Daryl Sieverding	<b>Phone Number</b>	605-661-5268 cell
<b>Responsible Party/Title</b>	Mayor Ritchy Griep	<b>Phone Number</b>	605-363-3861
<b>Mailing Address</b>	404 S. Madison, Humboldt, SD 57035		
<b>Inspection Date</b>	2/10/14	<b>Last Inspection Date</b>	June 7 & 9, 2010
<b>Location of Inspection</b>	Humboldt City Office		
<b>Inspector Name</b>	Mary Zanter & Boice Hillmer		

PART 191 REPORTING REQUIREMENTS		S	N/A	U	N/A
§191.5	Have any incident(s) occurred within the last 2 calendar years (yes or no)?				x
	Were incident(s) telephonically reported to NRC? (1-800-424-8802)				x
	Was all required information reported to NRC?				x
§191.9 and §191.15	Are incidents reported by telephone followed up with a 30-day written report? (RSPA Form 7100.1) – Distribution or (RSPA Form 7100.2) – Transmission and Gathering				x

PART 191 REPORTING REQUIREMENTS		S	N/A	U	N/A
	Was additional relevant information submitted as a supplementary report (if necessary)?				x
§191.11; §191.17; and ARSD 20:10:37:10	Are annual reports submitted to Washington and the SDPUC? (RSPA Form 7100.1-1) – Distribution Systems or (RSPA Form 7100.2-1) – Transmission and Gathering Systems				x
	Have changes been electronically submitted for the following? Notify PHMSA of any of the following events not later than 60 days before the event occurs:				
	A. Construction or any planned rehabilitation, replacement, modification, upgrade, uprate, or update of a facility, other than a section of line pipe, that costs \$10 million or more.				x
	B. Construction of 10 or more miles of a new pipeline; or				
	C. Construction of a new LNG plant or LNG facility.				
	Notify PHMSA of any of the following events not later than 60 days after the event occurs:				
	A. A change in the primary entity responsible (i.e., with an assigned OPID) for managing or administering a safety program required by this part covering pipeline facilities operated under multiple OPIDs.				x
	B. A change in the name of the operator;				
	C. A change in the entity (e.g., company, municipality) responsible for an existing pipeline, pipeline segment, pipeline facility, or LNG facility;				
	D. The acquisition or divestiture of 50 or more miles of a pipeline or pipeline system subject to Part 192 of this subchapter; or				
	E. The acquisition or divestiture of an existing LNG plant or LNG facility subject to Part 193 of this subchapter.				
§191.23	Does the facility have a procedure for reporting safety related conditions? O&M Manual page 110	x			
	(a) Did any of the following safety related conditions occur within the last 2 calendar years:				
	General corrosion that reduced wall thickness to less than required for the MAOP or localized corrosion pitting where leaks may occur (for pipelines operating at 20% or more of SMYS, i.e. transmission lines)				x
	Unintended movement or abnormal loading by environmental causes that impairs the serviceability of the pipeline				x
	Any crack or other material defect that impairs the structural integrity of a LNG facility that contains controls or process gas or LNG				x
	Any material defect or physical damage that impairs the serviceability of pipelines that operate at 20% or more of SMYS (transmission lines)				x
	Any malfunction or operating error that causes the MAOP to be exceeded (plus the allowed build up for pressure				x

PART 191 - REPORTING REQUIREMENTS		S	N/I	U	N/A
	limiting devices)				
	A leak in a pipeline that constitutes an emergency				X
	Inner tank leakage, ineffective insulation, or frost heave that impairs the structural integrity of a LNG storage tank				x
	Any safety-related condition that could lead to an imminent hazard and causes a reduction in operating pressure (by 20% or more) or shutdown of a pipeline				X
§191.23(b)	NOTE: reports are not required for: 1) master meter systems or customer-owned service lines; 2) incidents or conditions that result in an incident before the deadline for filing the report; 3) pipelines that are more than 220 yards from occupied buildings or outdoor places of assembly (except they are required in railroad and road ROWs); and 4) if the condition is corrected by repair or replacement before the deadline for filing the report (except they are required for general corrosion conditions)				
§191.25	(a) Was a report filed within five (5) working days of determination and within ten (10) working days of discovery for each safety-related condition?				x
	Was all required information included in the "Safety-Related Condition Report" (refer to 191.25(b))?				x

		S	N/I	U	N/A
	O&M Plan was completely inspected in 2013.		x		
§192.605(a)	Is the plan reviewed and updated at intervals not exceeding 15 months but at least once each calendar year?		x		
	List sections of manual that have been significantly updated (i.e. additions/deletions) in the last 2 calendar years:				
§192.605(a)	Are appropriate parts of the manual kept at locations where operations and maintenance activities are conducted?		x		
	List locations:				
§192.605(b)(3)	Are construction records, maps, & operating history available to appropriate operating personnel?		x		
	List locations where and how these records are made available:				
	List operating personnel that have access to these records:				
§192.605(b)(8)	Does the facility periodically review the work done by operator personnel to determine the effectiveness, and adequacy of procedures used in normal operations and maintenance and modify the procedures when deficiencies are found?		x		

PART 192 - OPERATION & MAINTENANCE PLANS					S	N/I	U	N/A

PART 192 - EMERGENCY PLANS		S	N/I	U	N/A
	Emergency Plan was completely inspected in 2013.		x		
§192.615	Does the operator have a written emergency plan?		x		
§192.605(e)	Date of most current review & update				
	Date of previous review & update				
	Signature				
	Has the operator made provisions for:				
§192.615(b)(1)	(a) Furnishing applicable portions of the emergency plan to supervisory personnel who are responsible for emergency action? List of Persons Plan Furnished To:		x		
§192.615(b)(2)	(b) Training appropriate employees as to the requirements of the emergency plan.		x		
	Training Date				
	Personnel Trained				
	Comments				
§192.615(b)(3)	(c) 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?		x		
§192.615(c)	Establish mutual liaison with fire, police, and other public officials, such that each is aware of the others resources and capabilities in dealing with gas emergencies.				
	(1) Learn the responsibility and resources of each government organization that may respond to a gas pipeline emergency		x		
	(2) Acquaint the officials with the operator's ability in responding to a gas pipeline emergency		x		
	(3) Identify the types of gas pipeline emergencies of which the operator notifies the officials		x		
	(4) Plan how the operator and officials can engage in mutual assistance to minimize hazards to life or property		x		

PART 192 - TEST REQUIREMENT RECORDS FOR PIPELINES		S	N/I	U	N/A
	Review records for mains and services installed during the last two years. Only one new service installed - 1101 N Ford St.				
§192.503	Have any new segments of pipeline been installed or segments of relocated or replaced pipeline been returned to service (yes or no)?				x
§192.503(d)	Is each non-welded joint used to tie in a test segment leak tested at not less than its operating pressure? (yes or no)	x			

PART 192 - TEST REQUIREMENT RECORDS FOR PIPELINES		S	N/A	U	N/A
192.505(a)	Note: in class 1 or 2 locations if there is a building intended for human occupancy within 300 ft, a hydrostatic test must be conducted to a test pressure of at least 125% of MOP. If the buildings are evacuated while hoop stress exceeds 50% of SMYS then air or gas may be used as a test medium.				
§192.505(b)	Have any compressor, regulator, or measuring stations been newly installed or replaced in Class 1 and Class 2 locations? (yes or no)  If yes, were they tested to at least Class 3 location requirements?				X
§192.505(c)	Is the pressure at or above test pressure for at least eight hours? (yes or no)				X
§192.505(d) §192.505(d)(1) §192.505(d)(2) §192.505(d)(3)	If only components were added or replaced (not pipe) and not pressure tested: Does facility have manufacturer certification of at least one of the following: - component was tested to the pressure required for the pipeline to which it is being added; - component was manufactured under a quality control system that ensures each item is at least equal in strength to a prototype and the prototype was tested to a test pressure required for the pipeline to which it is being added; or - component carries a pressure rating established through applicable ASME/ANSI, MSS specifications, or by unit strength calculations as described in §192.143.  List or highlight which certification the facility has within its records.				X
§192.505(e)	Were any fabricated or short sections of pipe installed? (yes or no)  If yes were these sections pressure tested for at least four hours before they are installed, if it is impractical to pressure test after installation? (yes or no)				X
§192.507(b)(1) §192.507(b)(2)	If the segment is stressed to 20 percent or more of SMYS and is using natural gas, inert gas, or air is one of the following used: - A leak test at a pressure between 100 psig and the pressure required to produce a hoop stress of 20 percent of SMYS; or - The line is walked to check for leaks while the hoop stress is held at approximately 20 percent of SMYS  List or highlight the one used.				X
§192.507(c)	Is the pressure maintained at or above the test pressure for at least one hour? (yes or no)				X
192.509 and 192.517	<b>For pipelines (except plastic and service) to operate below 100 psig.</b> Are pressure test records maintained that contain the following information (these records must be maintained for at least 5 years): - Date - Location of test - Test pressure applied - Test duration				X X X X
§192.509(b)	Is each main that is to be operated at less than 1 psig tested to at least 10 psig? (yes or no)				X
§192.509(b)	Is each main that is to be operated at or above 1 psig tested to at least 90 psig? (yes or no)				X

PART 192 - TEST REQUIREMENT RECORDS FOR PIPELINES		S	N/A	U	N/A
192.511 and 192.517	<b>For non-plastic service lines.</b> Are pressure test records maintained that contain the following information (these records must be maintained for at least 5 years): - Date - Location of test - Test pressure applied - Test duration				X X X X
§192.511(a)	If feasible, is the connection to the main included in the test? (yes or no)				X
§192.511(b)	Are service lines expected to operate at a pressure of at least 1 psig but not more than 40 psig tested at a pressure of not less than 50 psig? (yes or no)				X
§192.511(c)	Are service lines expected to operate at a pressure of more than 40 psig tested at a pressure of not less than 90 psig? (yes or no)				X
§192.511(c)	Are steel service lines stressed to 20% or more of SMYS tested in accordance with §192.507?				X
192.513 and 192.517	<b>For plastic pipelines.</b> Are pressure test records maintained that contain the following information (these records must be maintained for at least 5 years): - Date - Location of test - Test pressure applied - Test duration				X X X X
§192.513(a)	Is each segment of a plastic pipeline tested in accordance with this section? (yes or no)	X			
§192.513(c)	Does the operator test to at least 150% of the maximum operating pressure or 50 psig whichever is greater? (yes or no and list out which one is greater for each operator)	X			
§192.513(d)	During the test, is the temperature of the pipe not more than 100°F, or the temperature at which the long term hydrostatic strength has been determined, whichever is greater? (yes or no and list out which one is greater for each operator)	X			

PART 192 - FIELD REPAIR RECORDS - TRANSMISSION LINES		S	N/A	U	N/A
192.709(a)	Are field repair records (for the pipe) maintained that contain the following information (these records must be maintained for the life of the pipeline): - Date - Location of repair - Description of each repair made (including pipe-to-pipe connections)				X X X
192.709(b)	Are field repair records (for parts of the system other than the pipe) maintained that contain the following information (these records must be maintained for at least 5 years): - Date - Location of repair - Description of each repair made				X X X
192.709(c)	Note: Repairs generated by patrols, surveys, inspections, or tests required by subparts L and M of this part must be retained for at least 5 years or until the next patrol, survey, inspection, or test is completed (whichever is longer). <b>Testing of repairs</b>				

VI PART 192 - FIELD REPAIR RECORDS - TRANSMISSION LINES		S	NI	U	N/A
§192.719(a)	Were any segments of pipe replaced within the system? (yes or no)  If yes, was the replacement pipe tested to the requirement of a new line installed in the same location and records maintained as required under Subpart J Testing Requirements? (Note: the pipe may be tested before it is installed)				X

VI PART 192 - REINSTATEMENT REQUIREMENTS FOR REINSTATING SERVICE LINES		S	NI	U	N/A
	Were any service lines reinstated?				X
§192.725(a)	Does the operator test reinstated service lines in the same manner as new lines and maintain records as required by Subpart J?				X
§192.725(b)	Is each service line that is temporarily disconnected tested from the point of disconnection and records maintained as required by Subpart J?				X

		S	NI	U	N/A
	Review welding records from past two years.				
	General Welding procedures are generic guidance with no specific weld procedure established. If work needs to occur on the steel system a weld procedure will need to be established. Operator should establish appropriate weld procedures.				
§192.225(a)	Is welding performed by a qualified welder in accordance with API 1104, section IX of the ASME Boiler and Pressure Vessel Code, or Appendix C of Part 192? (yes or no)  If yes, highlight or specify which method is used.				X
API 1104	If using API 1104, does operator maintain records of qualified welders that contains the following information (it is recommended they use Figure 2 from API 1104):				X
	- Date of welding				X
	- Location				X
	- Name of welder				X
	- Weld position				X
	- Welding time				X
	- Weather conditions				X
	- Voltage				X
	- Amperage				X
	- Welding machine type				X
	- Welding machine size				X
	- Filler metal				X
	- Reinforcement size				X
	- Pipe type and grade				X
	- Wall thickness				X
	- Outside diameter				X
	- Tensile strength information (and any remarks on tensile strength test)				X
	- Bend test information (and any remarks on bend test)				X
	- Nick-break test information (and any remarks on nick-break test)				X
	- Date tested				X
	- Location of test				X
	- Name of tester				X
	- Results of qualification test (whether they are qualified or disqualified)				X

VI PART 192 - WELDING RECORDS		S	NI	U	N/A
§192.225(b)	Has each welding procedure been recorded in detail, including the results of the qualifying tests? Welding procedures are generic guidance with no specific weld procedure established. If work needs to occur on the steel system a weld procedure will need to be established. Operator should establish appropriate weld procedures.  If using API 1104, does the record include the items in Appendix A of this form?  If using ASME Boiler and Pressure Vessel code, does the record include the items in Appendix B of this form?  Did the procedures pass all the tests?  Does the data on the record conform to the requirements of the welding standard used (1104 or Boiler and Pressure Vessel)?			X	
§192.229(b)	Does operator maintain records for each qualified welder that show the welder has engaged in a specific welding process (for welders that qualify under 192.227(a))?			X	
192.229(c)	(1) For pipelines operating at a pressure that produces a hoop stress of 20% or more of SMYS, does the operator have records that show within the preceding 6 months the welder has had one weld tested and found acceptable under section 6 or 9 of API Standard 1104. <i>Exception: A welder qualified under an earlier addition may weld but not requalify under that earlier addition.</i>  Alternatively, do welders maintain an ongoing qualification status by performing welds tested and found acceptable under section 6 or 9 of API 1104 at least twice each calendar year, but at intervals not exceeding 7-1/2 months?  (2) May not weld on pipe to be operated at a pressure less than 20 percent of SMYS unless the welder is tested in accordance with §192.229(c)(1) or requalifies under §192.229(d)(1) or (d)(2).				X
192.229(d)	For welders that qualify under 192.227(b), does operator maintain records for each qualified welder that show the welder has been requalified within preceding 15 calendar months or within the preceding 7 1/2 calendar months (at least twice a year) had one of the following: <ul style="list-style-type: none"><li>- a production weld cut out, tested, and found acceptable with the qualifying test; or</li><li>- for welders that work only on service lines 2 inches or smaller, two sample welds tested and found acceptable in accordance with section III of Appendix C</li></ul>				X
§192.243(d)	When nondestructive testing is required under §192.241(b), are the following percentages of each day's field butt welds, selected at random by the operator, nondestructively tested over their entire circumference?				
§192.243(d) (1)	In Class 1 locations, except offshore, at least 10 percent				X
§192.243(d) (2)	In Class 2 locations, at least 15 percent.				X
§192.243(d) (3)	In Class 3 and Class 4 locations, at crossings of major or navigable rivers, offshore, and within railroad or public highway rights-of-way, including tunnels, bridges, and overhead road crossings, 100 percent unless impracticable, in which case at least 90 percent. Nondestructive testing must be impracticable for each girth weld not tested.				X



VII. PART 192 - RECORDS		S	N/A	U	N/A
§192.243(f)	Are records showing by milepost, engineering station, or geographic feature, the number of girth welds made, the number tested, the number rejected, and the disposition of the rejects retained for the life of the pipeline?				x

VIII. PART 192 - INSPECTION PROCEDURES		S	N/A	U	N/A
§192.245	The operator's procedures should be inspected in the field to determine if they are being followed.				x

IX. PART 192 - JOINTS OF PIPELINE MATERIALS		S	N/A	U	N/A
	What types of joining does the operator perform (i.e. plastic fusion, mechanical joints, electrofusion)?  List out all types of joining used. Daryl is only qualified for permasert type stab fittings. Humboldt used Q3 for all fusion.				
192.283	Does operator have written procedures for each type of joint available for review? (yes or no)	X			
	Do these procedures follow what is required by the manufacturer? Has the operator changed any parameters? (yes or no)	X			
	Does operator have copies of the destructive tests used to qualify the joining procedures? (yes or no) use manufacturers procedures				x
192.285(a)(1) 192.285(a)(2) and 192.285(c)	Does operator have copies of employee training dates and type of join training for each employee? (yes or no) Cannot find Daryl's OQ for 2013 but recorded that it was done 3/1/13.			x	
	Does operator have copies of employee making specimen joints from pipe sections joined according to the procedure that passes inspection and test as set forth in 192.285(b)?			x	
	Does the operator maintain records of each employee's requalification? (yes or no)				
	Is the requalification done as required and documented within their records (if employees do not make a joint during a 12 month period or if 3 joints or 3%, whichever is greater, are found unacceptable then they must be requalified)? (yes or no)		x		
	<i>Note: be sure to see if operator has applied for and obtained a waiver on this issue and make sure they are following the waiver requirements.</i>				
192.287	Is each person that inspects joints in plastic pipe qualified by appropriate training or experience in evaluating the acceptability of plastic pipe joints?		x		

X. PART 192 - INSPECTION PROCEDURES		S	N/A	U	N/A
§192.307	The operator's procedures should be inspected in the field to determine if they are being followed.		x		

XI. PART 192 - INSPECTION PROCEDURES		S	N/A	U	N/A

XI. PART 192 - ABNORMAL OPERATIONS - TRANSMISSION LINES		S	N/A	U	N/A
§192.605(c)	Has the operator had any occurrences of the following conditions in the last 2 years (yes or no): - Unintended closure of valves or shutdowns - An increase or decrease in pressure or flow rate outside of normal operating limits - Loss of communications - The operation of any safety device - Any other malfunction of a component - Any deviation from normal operation - Any other foreseeable malfunction of a component, deviation from normal operation, or personnel error				
	List out what type and date of occurrence.				
§192.605(c)(4)	If abnormal operation occurred, did operator review personnel response considering the actions taken, whether procedures were followed, and whether procedures were adequate or should be revised? Was this review documented?				x

XII. PART 192 - SURVEILLANCE		S	N/A	U	N/A
§192.613(a)	Has the operator conducted continuing surveillance to determine if the following issues need to be addressed: - Change in class location - Failures - Leakage history - Corrosion - Cathodic protection - Other unusual conditions If yes, provide explanation of issues operator feels need to be addressed. Operator doing surveillance on a weekly basis.				
§192.613(b)	Has the operator documented and initiated a program to correct problems discovered?	x			

XIII. PART 192 - DAMAGE PREVENTION		S	N/A	U	N/A
§192.614	Does the operator have a list of persons/companies that engage in excavating? (yes or no) Participate in SDPA.	X			
192.617	Does operator maintain records of accidents and failures and their causes?				X
	Has operator addressed the causes of failure to minimize the possibility of recurrence?				X
	Do the operator's and operator's contractors drilling/boring procedures include actions to protect their facilities from the dangers posed by drilling and other trenchless technologies?				X
	Did the operator follow its written procedures pertaining to notification of excavation, marking, positive response and the use of the one call system?				X
	What is the operator's number of pipeline damages per 1,000 locate requests?				x

XIV. PART 192 - PUBLIC EDUCATION		S	N/A	U	N/A
	Procedures for §192.616 - This information is covered in a separate inspection checklist.				

XV. PART 192 - FAILURE INVESTIGATION		S	N/A	U	N/A

§192.617	Have any accidents or failures occurred within the past 2 years? <i>If yes, give explanation.</i>					X
	If yes, was the accident and/or failure analyzed to determine the cause and steps taken to minimize a recurrence?					X
	Was the analysis documented?					

XVII. PART 192 - PRESSURE LIMITING AND REGULATING STATION RECORDS		S	NI	U	N/A
§192.619/621	Is the MAOP commensurate with the class location? (Spot check calculations)	X			
§192.623	How was the MAOP determined?	X			
	(a) By design and test?				
	(b) By highest operating pressure to which the segment of line was subjected between July 1, 1965 and July 1, 1970.				X
	Were MAOP's determined correctly?	X			

**NOTES:**

§192.505	Strength test requirements for steel pipeline to operate at a hoop stress of 30 percent or more of SMYS.
§192.507	Test requirements for steel pipeline to operate at a hoop stress less than 30 percent or more of SMYS and at or above 100 psig.
§192.509	Test requirements for pipelines to operate below 1000 psig.

XVIII. PART 192 - TELEMETERING OR RECORDING GAUGE RECORDS DISTRIBUTION		S	NI	U	N/A
§192.739(a)	Does the operator perform and document inspections on pressure limiting relief devices and pressure regulators not to exceed 15 months, but at least annually to determine the following:	X			
	In good mechanical condition?	X			
	Adequate from the standpoint of capacity and reliability of operation for the service in which it is employed?	X			
	Set to control or relieve at the correct pressures consistent with the pressure limits of §192.201(a)? (See exception in §192.739(b))	X			
	(d) Properly installed and protected from dirt, liquids or other conditions that might prevent proper operation?	X			
§192.739(b)	Does the operator have any steel pipelines whose MAOP is determined under §192.619(c)? If yes, the following control or relief pressures apply and inspector should double check operator calculations.				
	If the MAOP is 60 PSI gage or more, the control or relief pressure limit is as follows:				
	If the MAOP produces a hoopstress of:				
	1) 72 percent or greater then the pressure limit is the MAOP plus 4 percent.				
	2) Unknown as a percentage of SMYS, then the pressure limit is a pressure that will prevent unsafe operation of the pipeline considering its operating and maintenance history and MAOP.				X

XVII. PART 192 - PRESSURE LIMITING AND REGULATING STATION RECORDS		S	NI	U	N/A
§192.743	Does the operator perform and document inspections on relief devices not to exceed 15 months but at least once each calendar year to determine the following? Calculations are missing for 2013.				
	(a) Has sufficient capacity been determined by testing in place or by review and calculations?			X	
	(b) Are calculations used to determine capacity available?			X	
	(c) Required that unsatisfactory conditions be corrected in an appropriate time frame?				X

XVIII. PART 192 - TELEMETERING OR RECORDING GAUGE RECORDS DISTRIBUTION		S	NI	U	N/A
§192.741(a)	Does the operator have telemetering or pressure recording gauges to indicate gas pressure in the district that is supplied by more than one district pressure regulating station? (yes or no)				X
§192.741(b)	Has the operator determined if telemetering or pressure recording gauges are needed for a distribution system supplied by only one district pressure regulating station? (yes or no)				X
§192.741(c)	Does the operator inspect equipment and take corrective measures when there are indications of abnormally high or low pressure? (yes or no)				X
	Are these inspections documented within the operator's records? (yes or no)				X

XIX. PART 192 - PREVENTION OF ACCIDENTAL IGNITION		S	NI	U	N/A
§192.751	The operator's procedures should be inspected in the field to determine if they are being followed.		X		