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South Dakota

PUBLIC UTILITIES COMMISSION

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March 27, 2015

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

RE: South Dakota Records Inspection of Humboldt Municipal Gas Utilities

Dear Mayor Gripp:

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 me 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 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 response is required for a Notices of Concern but action by the operator to the pipeline facility is anticipated to occur in the near future.

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
Amanda Siemonsma, City of Humboldt, finance@humboldtsd.com
Boice Hillmer, SDPUC, boice.hillmer@state.sd.us

Attachments

**2015 South Dakota Pipeline Safety Inspection
 Summary of Deficiencies
 Operator: Humboldt Municipal Gas Utility
 Inspection Types: Standard Records Inspection
 Inspection Dates: 3/23/15**

Notices of Probable Violation

Code Section	Code Description	Deficiency Noted	Proposed Correction Due Date	Penalty Proposed	Maximum Allowable Penalty	Compliance Order Proposed
§192.16	Has the operator notified all customers by August 14, 1996 or new customers within 90 days of their responsibility for those sections of service lines not maintained by the operator?	Unable to locate documentation. Unsure if this has been done or not. Operator must determine when it was last done and ensure all new customers since that time are provided the information.	5/15/15	To Be Determined	\$100,000	Humboldt must hire additional help in the area of gas technician and DOT coordinator.
§192.625(f)	Did the operator use calibrated odorometers?	Calibrated 6/17/14. Missing calibration for 2013, although on 8/26/13 the PUC received the following information from Kristie Ellis. "The odorometer was sent in on 5/22/13 and received back on 6/3/13. Calibration completed. A calendar has been devised to ensure that the calibration will not be missed again."	5/15/15	To Be Determined	\$100,000	Humboldt must hire additional help in the area of gas technician and DOT coordinator.

Warnings

Code Section	Code Description	Deficiency Noted	Warning	Proposed Correction Due Date
§192.463	Did the operator use calibrated	Contractor doing the reads in 2013 and	Humboldt Municipal Gas may	5/15/15

Warnings

Code Section	Code Description	Deficiency Noted	Warning	Proposed Correction Due-Date
(a)	half cells?	2014 used a calibrated half cell and considered IR drops. Need documentation for 2014 calibration.	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.	
§192.463 (a)	Does the level of cathodic protection meet the requirements of Appendix D criteria: (1) a negative (cathodic) voltage of at least 0.85 volt (Cu-CuSO ₄ ½ cell) also need to consider IR drop	<p>Terry Hanson completed the cathodic reads October 27, 2014. The previous reads were done on July 22, 2013 by Marty I.</p> <p>No read was recorded for Farm tap to 45856 - Read #4.</p> <p>Either a number of reads were not done in 2013 or else the date was documented incorrectly as 7/22/14 on the following: Read 1 Read 8 Read 12</p> <p>Many of the reads taken in 2013 are documented in the wrong units. For example Read #3 has -1.532 mV when it should read 1532 mV.</p> <p>With further investigation it appears someone transferred the information into the form from the 2013 information from Marty Izzo's documentation. All information was not transferred correctly. Information needs to be corrected.</p>	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.	5/15/15
§192.465(a)	Has each pipeline that is	Test point #13 was not read in 2014.	Humboldt Municipal Gas may	5/15/15

Warnings

Code Section	Code Description	Deficiency Noted	Warning	Proposed Correction Due Date
	cathodically protected been tested at least once each calendar year not to exceed 15 months?		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.	
§192.475(a)	Is gas tested to determine corrosive properties?	Operator is not reviewing gas quality to ensure that corrosive properties do not exist.	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.	5/15/15
§192.479(a)	Have above ground facilities been cleaned and coated?	Work has been completed for 2014 but it is not documented. The atmospheric corrosion records are available 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.	5/15/15

Notices of Concern

Code Section	Code Description	Comment
	None	



PIPELINE SAFETY RECORDS INSPECTION CHECKLIST

2015
South Dakota Public Utilities Commission

PART 192 - CUSTOMER NOTIFICATION			
Operator Evaluated	Humboldt Municipal Gas		
Operator IOCS ID	30964		
Inspection Unit IOCS ID			
Unit Description	11 mile steel pipeline feeding the city of Humboldt and the plastic distribution system in Humboldt.		
Portions of Unit Inspected	Records: Pipe-to-Soil Reads 2013 & 2014 Casing Reads 2013 & 2014 Isolated Segment Reads NA Rectifier Reads NA Examination of Buried Pipe Reports 2013 & 2014 Interference Bond Records NA Gas Composition not available during inspection Atmospheric Corrosion Records only 2013 available. Class Location Studies NA Odorization Checks 2013 and 2014 Patrolling 2013 and 2014 Leak Survey 2013 and 2014 Line Markers to be field inspected Valve Maintenance 2013 and 2014 Steel Replacement Projects - for cathodic actions. NA		
Contact Person / Title <small>(person interviewed)</small>	Daryl Sieverding	Phone Number	(605) 361-5268
Responsible Party/Title	Mayor Ritchy Griep	Phone Number	(605) 363-3789
Mailing Address	PO Box 72 100 South Main St. Humboldt, SD 57035		
Inspection Date	3/23/15	Last Inspection Date	5/9/2013
Location of Inspection	Humboldt		
Inspector Name	Mary Zanter		
PART 192 - EXCESS FLOW VALVES			
§192.383(b)	Has the operator installed § 192.381 compliant EFV's on all new or replaced service line serving a single-family residence after February 12, 2010? Exceptions: (1) The service line does not operate at a pressure of 10 psig or greater throughout the year; (2) The operator has prior experience with contaminants in the gas stream that could interfere with the EFV's operation or cause loss of service to a residence; (3) An EFV could interfere with necessary operation or maintenance activities, such as blowing liquids from the line; or (4) An EFV meeting performance standards in § 192.381 is not commercially available to the operator.		
§192.383(c)	Does the annual report contain the number of EFV's installed? The annual report for 2014 is not completed but was completed prior to completion of this report.		
PART 192 - CORROSION GENERAL			
§192.453	(c) Are these procedures under the responsibility of a qualified person?		
PART 192 - EXTERNAL CORROSION CONTROL			
§192.455(a)	Did the operator use calibrated half cells? Contractor doing the reads in 2013 and 2014 used a calibrated half cell and considered IR drops. Need documentation for 2014 calibration.		
§192.455(a)	For pipelines installed after July 31, 1971: Are buried segments externally coated & cathodically protected within one year?		

PART 192 - CUSTOMER NOTIFICATION				S	NI	U	N/A
§192.16	Has the operator notified all customers by August 14, 1996 or new customers within 90 days of their responsibility for those sections of service lines not maintained by the operator? Unable to locate documentation. Unsure if this has been done or not.					x	
§192.16 (b)	Does the operator have a current copy of the notification?					x	
	Does notification contain all the following requirements:					x	
	(1) operator does not maintain the customer's buried piping					x	
	(2) if customer's buried piping is not maintained, it may be subject to corrosion and leakage					x	
	(3) buried gas piping should be:					x	
	(i) periodically inspected for leaks						
	(ii) periodically inspected for corrosion (if metal pipe)					x	
	(iii) repaired if any unsafe condition is discovered					x	
	(4) when excavating near buried gas piping, the piping should be located in advance, and the excavation done by hand					x	
	(5) the operator, plumbing contractors, and heating contractors can assist in locating, inspecting, and repairing the customer's buried piping					x	

PART 192 - EXCESS FLOW VALVES				S	NI	U	N/A
§192.383(b)	Has the operator installed § 192.381 compliant EFV's on all new or replaced service line serving a single-family residence after February 12, 2010? Exceptions: (1) The service line does not operate at a pressure of 10 psig or greater throughout the year; (2) The operator has prior experience with contaminants in the gas stream that could interfere with the EFV's operation or cause loss of service to a residence; (3) An EFV could interfere with necessary operation or maintenance activities, such as blowing liquids from the line; or (4) An EFV meeting performance standards in § 192.381 is not commercially available to the operator.						x
§192.383(c)	Does the annual report contain the number of EFV's installed? The annual report for 2014 is not completed but was completed prior to completion of this report.	x					

PART 192 - CORROSION GENERAL				S	NI	U	N/A
§192.453	(c) Are these procedures under the responsibility of a qualified person?						

PART 192 - EXTERNAL CORROSION CONTROL				S	NI	U	N/A
	Did the operator use calibrated half cells? Contractor doing the reads in 2013 and 2014 used a calibrated half cell and considered IR drops. Need documentation for 2014 calibration.					x	
§192.455(a)	For pipelines installed after July 31, 1971: Are buried segments externally coated & cathodically protected within one year?						x

PART 192 - EXTERNAL CORROSION CONTROL		S	N/A	U	N/A
§192.455(b)	For pipelines installed without cathodic protection: Are there any pipelines without cathodic protection? (1) Has the operator proved that a corrosive environment does not exist? (2) Conducted tests within 6-months to confirm (#1) above?				x
§192.455	Pipeline Material Types: What kinds of pipeline materials are used? Steel, Copper, Plastic, Cast Iron				
§192.455(c)(1)	For bare copper pipeline: Is the pipeline cathodically protected if a corrosive environment exists?				x
§192.455(c)(2)	For bare temporary (less than 5 year period of service) pipelines: For unprotected pipelines, has it been demonstrated that corrosion during the 5-year period will not be detrimental to public safety?				x
§192.455(e)	For aluminum pipeline: Is the natural pH of the environment <8.0? If not, has operator conducted tests or have experience to indicate the aluminum pipeline suitability with its environment?				x
§192.455(f)	Metal alloy fittings on plastic pipelines: (1) Has operator shown by test, investigation, or experience that adequate corrosion control is provided by the alloy composition? (2) Fitting is designed to prevent leakage caused by localized corrosion pitting?				x
§192.457(a)	Pipelines installed before August 1, 1971: Are effectively coated transmission pipelines cathodically protected?				x
§192.457(b)	(Except for cast iron or ductile iron) Is cathodic protection provided in areas of active corrosion on: (1) existing bare or ineffectively coated transmission pipelines? (2) existing bare or coated pipes at compressor, regulator, and measuring stations? (3) existing bare or coated distribution lines?				x
§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?				x
§192.459	If external corrosion requiring remedial action is found, is the pipeline investigated circumferentially and longitudinally beyond the exposed portion to determine whether additional corrosion requiring remedial action exists?				x
§192.459	Does operator have procedures established for examining exposed cast iron pipe for evidence of graphitization? Does operator have procedures established for remedial measures on cast iron pipe if graphitization is discovered, AGA GPTC Appendix G-18 (NTSB)?				x
§192.461(a)	Does the coating on steel pipe meet the requirements of this part? (1) applied on a properly prepared surface? (2) has sufficient adhesion to resist underfilm migration of moisture? (3) sufficiently ductile to resist cracking? (4) has sufficient strength to resist damage due to handling and soil stress? (5) compatible with supplemental cathodic protection?				x
§192.461(b)	If external coating is electrically insulating does it have low moisture absorption and high electrical resistance?		x		
§192.461(c)	Is the external coating inspected prior to lowering the pipe into the ditch and is any damage repaired?		x		
§192.461(d)	Is external protective coating protected from damage resulting from adverse ditch conditions or damage from supporting blocks?		x		

PART 192 - EXTERNAL CORROSION CONTROL		S	N/A	U	N/A
§192.461(e)	If coated pipe is installed by boring, driving, or similar method, are precautions taken to minimize damage to the coating?		x		
§192.463 (a)	Does the level of cathodic protection meet the requirements of Appendix D criteria?		x		
Appendix D	Steel, cast iron, and ductile iron				
Part I	(1) a negative (cathodic) voltage of at least 0.85 volt (Cu-CuSO ₄ ½ cell) also need to consider IR drop Terry Hanson completed the cathodic reads October 27, 2014. The previous reads were done on July 22, 2013 by Marty I. No read was recorded for Farm tap to 45856 - Read #4. Either a number of reads were not done in 2013 or else the date was documented incorrectly as 7/22/14 on the following: Read 1 Read 8 Read 12 Test point #13 was not read in 2014. Many of the reads taken in 2013 are documented in the wrong units. For example Read #3 has -1.532 mV when it should read 1532 mV. With further investigation it appears someone transferred the information into the form from the 2013 information from Marty Izzo's documentation. All information was not transferred correctly. Information needs to be corrected.			x	
	(2) a negative voltage shift of at least 300 millivolts (applies to structure not in contact with metals of different anodic potentials) also need to consider IR drop				x
	(3) a minimum negative polarization voltage shift of 100 millivolts (interrupting the protective current and measuring the polarization decay)				x
	(4) voltage at least as negative as that originally established at beginning of Tafel segment of E-log-I curve				x
	(5) net protective current				x
	<i>Refer to Appendix D if aluminum, copper, or other metals are within the system also note that other reference cells besides Cu-CuSO₄ half-cells can be used if they meet criteria in Section IV of Appendix D</i>				
§192 Appendix D. Part II	Does the operator criteria consider IR drop?	x			
§192.463 (b)	If amphoteric metals are included in a buried or submerged pipeline containing a metal or different anodic potential are they: (1) electrically isolated from the remainder of the pipeline and cathodically protected?; OR (2) cathodically protected at a level that meets the requirements of Appendix D for amphoteric metals?				x
§192.463 (c)	Is the amount of cathodic protection controlled to prevent damage to the protective coating or the pipe?				x
§192.465(a)	Has each pipeline that is cathodically protected been tested at least once each calendar year not to exceed 15 months? Test point #13 was not read in 2014.			x	

PART 192 - EXTERNAL CORROSION CONTROL		S	N/A	U	N/A
§192.465(a)	Are 10 percent of short sections of mains or transmission lines and separately protected service lines distributed over the entire system tested each year on a sampling basis, with a different 10 percent checked each year, so that the entire system is checked in each 10 year period?				x
§192.465(b)	Has each cathodic protection rectifier been inspected at least six times each year not to exceed 2-1/2 months?				x
§192.465(c)	Does the operator check for proper performance of each reverse current switch, diode, and interference bond whose failure would jeopardize structure protection at least six times each calendar year, but with intervals not exceeding 2-1/2 months?				x
§192.465(c)	Does the operator check for proper performance of other interference bonds at least once each calendar year, at intervals not exceeding 15 months?				x
§192.465(d)	Is prompt remedial action taken to correct any deficiencies indicated by the monitoring?				
	(a) Shorted Casings (6 months)				x
	(b) Rectifier (2-1/2 months)				x
	(c) Low p/s readings - case by case, depends on cause				x
§192.465(e)	Does the operator have bare pipelines?				x
	(a) Are they cathodically protected?				x
	(b) Are they reevaluated at 3 year intervals not exceeding 39 months?				x
	(c) Are remedial measures taken where necessary?				x
§192.467	Are buried pipelines electrically isolated from other underground structures?	x			
	(a) Are casing potentials monitored to detect the presence of shorts once each calendar year, not to exceed 15 months?	x			
	(b) Does the operator investigate & take appropriate action when indications of casing shorts are found?				x
	(c) Does the shorted casing procedure require or has the operator made: (Enforcement Policy)				
	(1) Determination of a course of action to correct or negate the effects of the shorts within 6 months of discovery.				x
	(2) Verification that a short exists				x
	(3) Cleaning of the short, if practicable. (This must be considered before alternative measures may be used.)				x
	(4) Filling the casing/pipe interstice with high-dielectric casing filler or other material which provides a corrosion inhibiting environment, if it is impractical to clear the short.				x
	(5) If (# 3) & (# 4) are determined to be impractical, monitor the casing with leak detection equipment for leakage at intervals not exceeding 7-1/2 months, but at least twice each calendar year.				x
	(6) If a leak is found by monitoring casings with leak detection equipment, immediate corrective action to eliminate the leak & further corrosion.				x
	(7) In lieu of other corrective actions, monitoring the condition of the carrier pipe using an internal inspection device at specified intervals.				x
§192.467(d)	Inspection and electrical tests must be made to assure that electrical isolation is adequate.				x
§192.467(e)	Are insulating devices prohibited in areas where a combustible atmosphere is anticipated unless precautions are made to prevent arcing?				x
§192.467(f)	Where pipelines are located in close proximity to electrical transmission tower footings, is protection provided to the pipelines against damage due to fault currents?				x

PART 192 - EXTERNAL CORROSION CONTROL		S	N/A	U	N/A
§192.469	Are there sufficient test stations or test points?				x
§192.471	(a) Are test leads mechanically secure to pipe and electrically conductive?				x
	(b) Are test leads attached to minimize stress concentration on the pipe?				x
	(c) Are each bared test lead wire and bared metallic area (at point of connection) coated with an electrical insulating material compatible with the pipe coating and insulation on the wire?				x
§192.473 (a)	Does the operator monitor their system for stray currents and take appropriate steps to minimize detrimental effects?	x			
§192.473 (b)	Does operator design and install each impressed current and/or galvanic anode cathodic protection system to minimize adverse effects on existing adjacent underground metallic structures?				x

PART 192 - INTERNAL CORROSION CONTROL		S	N/A	U	N/A
§192.475(a)	Is gas tested to determine corrosive properties? Operator is not reviewing gas quality to ensure that corrosive properties do not exist.			x	
§192.475(b)	Whenever a pipe segment is removed from a pipeline, is it examined for evidence of internal corrosion?				x
	If internal corrosion is found -				
§192.475(b)	(1) Is the adjacent pipe investigated to determine the extent of internal corrosion?				x
	(2) Is replacement made to the extent required by §§192.485, 192.487, or 192.489?				x
	(3) Is remedial action taken (if required) to minimize internal corrosion?				x
§192.475(c)	Gas containing >0.25 grain of hydrogen sulfide per 100 ft3 (at standard conditions) may not be stored in pipe-type or bottle-type holders.				x
§192.476(a)	Design and construction of transmission line installed after May 23, 2007:				
	Has transmission line or replacement of line pipe, valve, fitting, or other line component in a transmission line met the following requirements (unless operator proves impracticable or unnecessary):				
	(1) configured to reduce risk liquid collection in line				x
	(2) has effective liquid removal features if configuration would allow liquid collection				x
	(3) allow for use of devices for monitoring internal corrosion at locations with significant potential for internal corrosion				x
§192.476(c)	If operator changes configuration of transmission line, did they evaluate the impact of the change on internal corrosion risk to downstream portion of line and provide for removal of liquids and monitoring of internal corrosion?				x
§192.476(d)	Does operator maintain records that demonstrate compliance with this section? Does operator maintain as-built drawings or other construction records if found impracticable or unnecessary to follow (a)(1,2,3)				x
§192.477	Have coupons (for corrosive gas only) been utilized & checked at least twice annually not to exceed 7-1/2 months?				x

PART 192 - ATMOSPHERIC CORROSION CONTROL		S	N/A	U	N/A
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		S	NI	U	N/A
§192.479(a)	Have above ground facilities been cleaned and coated? Work has been completed for 2014 but it is not documented. The atmospheric corrosion records are available for 2013.			x	
§192.479(b)	Is the coating material suitable for the prevention of atmospheric corrosion?		x		
§192.481(a)	Does the operator inspect piping exposed to the atmosphere at least once every 3 calendar years, at intervals not to exceed 39 months for onshore piping?		x		
§192.481(b)	During inspection does the operator give particular attention to pipe at soil-to-air interfaces, under thermal insulation, under disbanded coating, at pipe supports, at deck penetrations, and in spans over water?		x		
§192.481(c)	If atmospheric corrosion is found, does the operator provide protection against the corrosion as required by §192.479?		x		

		S	NI	U	N/A
§192.483	Is replacement steel pipe coated and cathodically protected?				x
§192.485(a)	For each segment of transmission line with general corrosion and with a remaining wall thickness less than that required for the MAOP of the pipeline, is the section of pipeline replaced, repaired, or have the operating pressure reduced?				x
§192.485(b)	For each segment of transmission line with localized pitting to a degree where leakage might result, is the section of pipeline replaced, repaired, or have the operating pressure reduced?				x
§192.485(c)	Strength of pipe based on actual remaining wall thickness may be determined by ASME/ANSI B31G or AGA PR 3-805				x
§192.487(a)	For distribution lines with a remaining wall thickness less than that required for the MAOP of the pipeline or a remaining wall thickness less than 30 percent of the nominal wall thickness, does the operator replace or repair the pipe?				x
§192.487(b)	For distribution lines, does the operator replace or repair pipe with localized corrosion pitting?				x
§192.489(a)	Is each segment of cast iron or ductile iron pipe on which general graphitization is found to a degree where a fracture or any leakage might result, replaced?				x
§192.489(b)	Is each segment of cast iron or ductile iron pipe on which localized graphitization is found to a degree where any leakage might result, replaced or repaired, or sealed by internal sealing methods?				x

		S	NI	U	N/A
§192.491(a)	Does the operator maintain records or maps showing the location of cathodically protected pipe and facilities?	x			
§192.491(b)	Does the operator retain records showing the location of cathodically protected pipe and facilities for the life of the system? (See records check list)	x			
§192.491(c)	Does the operator maintain a record of each test, survey, or inspection required by this subpart in sufficient detail to demonstrate adequacy of corrosion control measures or that a corrosive condition does not exist for at least 5 years?	x			
§192.491(c)	Does the operator retain records related to §§192.465(a) and (e) and 192.475(b) retained for as long as the pipeline remains in service?	x			

		S	NI	U	N/A
§192.609	Has the operator determined that a class location study is required? Class location study – When increase in population density indicates a change in class location or indicates that the hoop stress corresponding to the established maximum allowable operating pressure for a segment of existing pipeline is not commensurate with the present class location, the operator shall immediately make a study to determine: (a) The present class location for the segment involved. (b) The design, construction, and testing procedures followed in the original construction, and a comparison of these procedures with those required for the present class location by the applicable provision part. (c) The physical condition of the segment to the extent it can be ascertained from available records. (d) The operating and maintenance history of the segment. (e) The maximum actual operating pressure and the corresponding operating hoop stress, taking pressure gradient into account, for the segment of pipeline involved. (f) The actual area affected by the population density increase, and physical barriers or other factors which may limit further expansion of the more densely populated area.				x
§192.611	What does the operator alter when population density requires a change in MAOP? (a) Test the pipe to qualify the new MAOP. (b) Reduce MAOP to meet the class location. (c) Replace pipe. Refer to 192.611 if MAOP is confirmed or revised (also see Subpart K if applicable)				x

		S	NI	U	N/A
§192.625(f)	No records on inspection or odorizer or filling of odorant. Did the operator use calibrated odorimeters? Calibrated 6/17/14. Missing calibration for 2013, although on 8/26/13 I received the following information from Kristie Ellis. "The odorometer was sent in on 5/22/13 and received back on 6/3/13. Calibration completed. A calendar has been devised to ensure that the calibration will not be missed again." What kind of equipment is used? Heath Odorator				x
§192.625(a)	Chemical Properties - Brand Name –				x
One-Fifth of the Lower Explosive Limit	Odorometer				
	Injection Rate				
	Odorization Method –				
§192.625(b)	Transmission Lines in Class 3 or 4 locations must comply with 192.625(a) if 50% or less of the length of the line downstream is in a Class 1 or 2 location. There are also other exceptions found within this section				x
§192.625(e)	Does the equipment introduce the odorant without wide variations in the level of odorant?	x			

XI. PART 192 - ODOUR AND DEF GAS		S	NI	U	N/A
§192.625(f)	Does the operator conduct periodic sampling of combustible gases using an instrument capable of determining the percentage of gas in air at which the odor becomes readily detectable?	x			

XII. PART 192 - MAINTENANCE		S	NI	U	N/A
§192.703(b)	Is each segment of a pipeline that becomes unsafe, replaced, repaired or removed from service?				x
§192.703(c)	Are hazardous leaks repaired promptly?				x

XIII. PART 192 - PATROLLING DISTRIBUTION		S	NI	U	N/A
§192.705(a)	Does the operator patrol surface conditions for indications of leaks, construction activity, or other factors on and adjacent to line ROW?				x
	(a) Does the operator follow up on problems noted?				x
§192.705(b)	Is the maximum interval between patrols in accordance with the following: (Maximum interval between patrols of lines)				
Class location	At Highway and Railroad Crossings				
1 and 2	2/yr (7-1/2 months)				x
3	4/yr (4-1/2 months)				x
4	4/yr (4-1/2 months)				x
	At all Other Places				
	1/Year (15 months)				
	2/yr (7-1/2 months)				x
	4/yr (4-1/2 months)				x

XIV. PART 192 - LEAKAGE SURVEYS DISTRIBUTION		S	NI	U	N/A
	Did the operator use calibrated leak detectors? What kind of equipment is used?				x
§192.706	(a) Are leakage surveys of transmission lines conducted at intervals not exceeding 15 months but at least once each calendar year?				x
	(b) Are lines transporting unodorized gas surveyed using leak detector equipment at intervals not exceeding 7-1/2 months but at least twice each calendar year for Class 3 locations and at intervals not exceeding 4-1/2 months but at least 4 times each calendar year for Class 4 locations?				x

XV. PART 192 - LINE MARKERS		S	NI	U	N/A
§192.707(a)	Are buried mains and transmission lines marked as required in the following areas:				
	(1) at each crossing of a public road and railroad		x		
	(2) wherever necessary to identify the location of the line to reduce possibility of damage or interference		x		
§192.707(b)	EXCEPTIONS where line markers are NOT required:				
	(1) lines located at crossings of or under waterways and other water bodies		x		
	(2) mains in Class 3 or 4 location where damage prevention program is in effect under §192.614		x		
	(4) transmission lines in Class 3 or 4 locations where placement of line marker is impractical		x		
§192.707(c)	Are line markers installed on aboveground areas accessible to the public?		x		
§192.707(d)	Do the line markers have the latest characteristics?				

XVI. PART 192 - LINE MARKERS		S	NI	U	N/A
	(1) "Warning", "Caution", "Danger" followed by "Gas Pipeline" (1" high with 1/4" stroke except in heavily developed areas)		x		
	(2) name and telephone number of operator (24 hr access)		x		

XVII. PART 192 - PATROLLING DISTRIBUTION		S	NI	U	N/A
§192.721(a)	Frequency of patrolling mains must be determined by the severity of the conditions which could cause failure or leakage (i.e., consider cast iron, weather conditions, known slip areas, etc.)	x			
§192.721(b)(1)	Does the operator patrol mains in business districts at intervals not exceeding 4-1/2 months, but at least 4 times each calendar year where anticipated physical movement or external loading could cause failure or leakage?	x			
§192.721(b)(2)	Does the operator patrol mains outside business districts at intervals not exceeding 7-1/2 months, but at least 2 times each calendar year where anticipated physical movement or external loading could cause failure or leakage?	x			

XVIII. PART 192 - LEAKAGE SURVEYS DISTRIBUTION		S	NI	U	N/A
	Did the operator use calibrated leak detectors? What kind of equipment is used?	x			
§192.723(b)(1)	Does the operator conduct gas detector surveys in the business district at intervals not exceeding 15 months, but at least once each calendar year? Entire system was leak surveyed in 2014.	x			
§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?	x			
§192.723(b)(2)	For cathodically unprotected distribution lines subject to §192.465(e) on which electrical surveys for corrosion are impractical is a leakage survey conducted at least once every 3 calendar years at intervals not exceeding 39 months?				x

XIX. PART 192 - VALVE MAINTENANCE - TRANSMISSION		S	NI	U	N/A
§192.745(a)	Does the operator check and service each valve which might be required during an emergency at intervals not exceeding 15 months, but at least once each calendar year?				x
§192.745(b)	Does the operator take prompt remedial action to correct any valve found inoperable, unless the operator designates an alternative valve?				x

XX. PART 192 - VALVE MAINTENANCE - DISTRIBUTION		S	NI	U	N/A
§192.747(a)	Does the operator check and service each valve which might be required during an emergency at intervals not exceeding 15 months, but at least once each calendar year?	x			
§192.747(b)	Does the operator take prompt remedial action to correct any valve found inoperable, unless the operator designates an alternative valve?				x

XXI. PART 192 - VALVES		S	NI	U	N/A
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		S	NI	0	N/A
	There are no vaults in SD.				
§192.749(a)	Is each vault that houses pressure regulating and limiting equipment (and has an internal volume of 200 ft ³ or more) inspected at least once each calendar year not exceeding 15 months? Vaults need to be inspected to determine if they are in good physical condition and adequately vented.				x
§192.749(b)	If gas was found in vault during inspection was equipment inspected for leaks? If leaks were found were they repaired?				x
§192.749(c)	Was ventilating equipment inspected to determine if functioning properly?				x
§192.749(d)	Was vault cover inspected to assure it does not present hazard to public safety?				x
§192.727(f)	If any vaults were abandoned, were they filled with a suitable compacted material?				x