

**Utilities and Transportation Commission**  
**Standard Inspection Report for Intrastate Gas Transmission Pipelines**  
**Form D - Records Review and Field Inspection**

S – Satisfactory    U – Unsatisfactory    N/A – Not Applicable    N/C – Not Checked  
 If an item is marked U, N/A, or N/C, an explanation must be included in this report.

A completed **Standard Inspection Checklist, Cover Letter and Field Report** is to be submitted to the Chief Engineer within 30 days from completion of the inspection.

Inspection Report			
<b>Inspection ID/Docket number</b>	8022		
<b>Inspector Name &amp; Submit Date</b>	Dave Cullom 4/24/2020		
<b>Chief Eng. Name &amp; Review Date</b>	Joe Subsits, 4/27/2020		
Operator Information			
<b>Name of Operator:</b>	J.R. Simplot Company	<b>OP ID #:</b>	32395
<b>Name of Unit(s):</b>	J.R. Simplot Company – Moses Lake		
<b>Records Location:</b>	Moses Lake, Wa		
<b>Date(s) of Last (unit) Inspection:</b>	6/27/2017	<b>Inspection Date(s):</b>	4/14/2020-4/17/2020

<p><b>Inspection Summary:</b></p> <p><b>**No areas of concern or probable violations noted**</b></p> <p>The J.R. Simplot potato processing facility located in Moses Lake includes a bio gas digester, non-jurisdictional compressor, and 8-inch diameter high density polyethylene (HDPE) bio gas transmission pipeline in Grant County with a length of 1.4 miles. The pipeline is a Class 1 Location per the 2017-2019 Annual Reports. The pipeline was subjected to a hydrostatic test pressure of 90 PSIG for 3 hours and operates at 15 psig MAOP per the manual, but original pressure test records indicated it was tested for 4 hours. There is no direct relief or worker/monitor system for overpressure protection. The compressor pump curve was reviewed, and it demonstrates that over pressurization cannot occur given the current configuration. The valve record annual testing question was not included in the original plan but valve records were reviewed. Valve operation was performed by Matt in October 2019 for valves 1 &amp; 2. I also reviewed 10/2/2018 records where Matt operated both valves. Hector, in 2017, operated valves 1 &amp; 2 on 5/9/2017 and 11/6/2017.</p>
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<b>HQ Address:</b> 1099 West Front Street Boise, Idaho 83702	<b>System/Unit Name &amp; Address:</b> J.R. Simplot Company – Moses Lake 14121 Wheeler Road, North East Moses Lake, WA 98837	
<b>Co. Official:</b> Mike Davis <b>Phone No.:</b> (509) 793-1134 <b>Fax No.:</b> <b>Emergency Phone No.:</b>	<b>Phone No.:</b> <b>Fax No.:</b> <b>Emergency Phone No.:</b> (509) 750-0113	
<b>Persons Interviewed</b>	<b>Title</b>	<b>Phone No.</b>
Lance Carter	Environmental Manager	(509) 793-1188
Stephen Hernandez	Consultant	(720) 647-3147

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<b>UTC staff conducted abbreviated procedures inspection on 192 O&amp;M and WAC items that changed since the last inspection. This checklist focuses on Records and Field items per a routine standard inspection.</b>			
(check one below and enter appropriate date)			
<input type="checkbox"/>	Team inspection was performed (Within the past five years.) or,	<b>Date:</b>	
<input checked="" type="checkbox"/>	Other UTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.)	<b>Date:</b>	4/3/2015 (SA)

GAS SYSTEM OPERATIONS			
<b>Gas Supplier</b>	J.R. Simplot Company is the user and producer		
Number of reportable safety related conditions last year	0	Number of deferred leaks in system	0
Number of <u>non-reportable</u> safety related conditions last year	0	Number of third party hits last year	0
Miles of transmission pipeline within unit (total miles and miles in class 3 & 4 areas)	1.4 miles		
<b>Operating Pressure(s):</b>		<b>MAOP (Within last year)</b>	<b>Actual Operating Pressure (At time of Inspection)</b>
Feeder:			
Town:			
Other:	13 psig	15	System was in shutdown.
Does the operator have any transmission pipelines?	Yes		
Compressor stations? Use Attachment 4.	No jurisdictional compressors		
Have incident reports and the annual report been reviewed for accuracy and analyzed for trends and operator issues?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		
<b>Comments:</b>			
I reviewed the 2017-2019 Annual Reports. There have been no damages on significant changes to the pipeline system.			

Pipe Specifications:			
Year Installed (Range)	2009	Pipe Diameters (Range)	8"
Material Type	HDPE SDR-11	Line Pipe Specification Used	ASTM D-2513
Mileage	1.4 miles per the 2019 AR	SMYS %	SMYS is part of the design formula for steel pipe. This pipe is PE.
Supply Company	Simplot creates and utilizes the gas.	Class Location	Class 2 per the O&M Manual

REPORTING RECORDS			S	U	N/A	N/C
1.	RCW 81.88.080	Pipeline Mapping System: Has the operator submitted information into NPMS database along with changes made after the original submission and have they provided accurate maps (or updates) of pipelines, operating over two hundred fifty pounds per square inch gauge, to specifications developed by the commission sufficient to meet the needs of first responders? <b>***Notes – line has an MAOP of 15 psig***</b>	X NPMS		X RCW	
2.	480-93-200(1)	Telephonic Reports to UTC <b>Pipeline Safety Incident Notification 1-888-321-9144 (Within 2 hours)</b> for events which (regardless of cause); <b>***Notes – PnP Manual 9.2.1***</b>				

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REPORTING RECORDS			S	U	N/A	N/C
3.	480-93-200(1)(a)	Result in a fatality or personal injury requiring hospitalization; <b>***Notes – PnP Manual 9.2.1a***</b>			X	
4.	480-93-200(1)(b)	Results in damage to property of the operator and others of a combined total exceeding fifty thousand dollars; <b>Note:</b> Report all damages regardless if claim was filed with pipeline company or not. <b>***Notes – PnP Manual 9.2.1b***</b>			X	
5.	480-93-200(1)(c)	Results in the evacuation of a building, or high occupancy structures or areas; <b>***Notes – PnP Manual 9.2.1c***</b>			X	
6.	480-93-200(1)(d)	Results in the unintentional ignition of gas; <b>***Notes – PnP Manual 9.2.1d***</b>			X	
7.	480-93-200(1)(e)	Results in the unscheduled interruption of service furnished by any operator to twenty five or more distribution customers; <b>***Notes – This requirement is for distribution operators***</b>			X	
8.	480-93-200(1)(f)	Results in a pipeline or system pressure exceeding the MAOP plus ten percent or the maximum pressure allowed by proximity considerations outlined in WAC 480-93-020; <b>***Notes – PnP Manual 9.2.1e***</b>			X	
9.	480-93-200(1)(g)	Is significant, in the judgment of the operator, even though it does not meet the criteria of (a) through (e) of this subsection; or <b>***Notes – PnP Manual 9.2.1f***</b>			X	
10.	480-93-200(2)	Telephonic Reports to UTC <b>Pipeline Safety Incident Notification 1-888-321-9144</b> (Within <b>24 hours</b> ) for; <b>***Notes – PnP Manual 9.2.1***</b>			X	
11.	480-93-200(2)(a)	The uncontrolled release of gas for more than two hours; <b>***Notes – PnP Manual 9.2.1a***</b>			X	
12.	480-93-200(2)(b)	The taking of a high pressure supply or transmission pipeline or a major distribution supply pipeline out of service; <b>***Notes – PnP Manual 9.2.1b***</b>			X	
13.	480-93-200(2)(c)	A pipeline operating at low pressure dropping below the safe operating conditions of attached appliances and gas equipment; or <b>***Notes – PnP Manual 9.2.1c***</b>			X	
14.	480-93-200(2)(d)	A pipeline pressure exceeding the MAOP <b>***Notes – PnP Manual 9.2.1d***</b>			X	

**Comments: \*\*\*Notes – #3-14 – No incidents have occurred during the inspection time period.\*\*\***

15.	480-93-200(5)	Written incident reports (within 30 days) including the following; <b>***Notes – PnP Manual 9.2.2***</b>	S	U	N/A	N/C
16.	480-93-200(4)(a)	Name(s) and address(es) of any person or persons injured or killed, or whose property was damaged; <b>***Notes – PnP Manual 9.2.2a***</b>			X	
17.	480-93-200(4)(b)	The extent of injuries and damage; <b>***Notes – PnP Manual 9.2.2b***</b>			X	
18.	480-93-200(4)(c)	A description of the incident or hazardous condition including the date, time, and place, and reason why the incident occurred. If more than one reportable condition arises from a single incident, each must be included in the report; <b>***Notes – PnP Manual 9.2.2c***</b>			X	
19.	480-93-200(4)(d)	A description of the gas pipeline involved in the incident or hazardous condition, the system operating pressure at that time, and the MAOP of the facilities involved; <b>***Notes – PnP Manual 9.2.2d***</b>			X	
20.	480-93-200(4)(e)	The date and time the gas pipeline company was first notified of the incident;			X	
21.	480-93-200(4)(f)	The date and time the ((operator's)) gas pipeline company's first responders arrived on-site;			X	
22.	480-93-200(4)(g)	The date and time the gas ((facility)) pipeline was made safe; <b>***Notes – PnP Manual 9.2.2e***</b>			X	
23.	480-93-200(4)(h)	The date, time, and type of any temporary or permanent repair that was made; <b>***Notes – PnP Manual 9.2.2f***</b>			X	
24.	480-93-200(4)(i)	The cost of the incident to the ((operator)) gas pipeline company; <b>***Notes – PnP Manual 9.2.2g***</b>			X	
25.	480-93-200(4)(j)	Line type;			X	
26.	480-93-200(4)(k)	City and county of incident; and			X	
27.	480-93-200(4)(l)	Any other information deemed necessary by the commission.			X	

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28	480-93-200(5)	Submit a supplemental report if required information becomes available ***Notes – PnP Manual 9.2.4***				
29	480-93-200(6)	Written report within 45 days of receiving the failure analysis of any <b>incident or hazardous condition</b> due to <b>construction defects or material failure</b> ***Notes – PnP Manual 9.2.3.1***				X

**Comments: \*\*\*Notes – #15-29 – No incidents have occurred during the inspection time period.\*\*\***

30	480-93-200(7)	<b>Filing Reports of Damage to Gas Pipeline Facilities to the commission. (eff 4/1/2013)</b> (Via the commission's Virtual DIRT system or on-line damage reporting form)				
31	49 CFR 192.617	Did the operator have appropriate records of previous accidents and failures including third party damage and leak response to ensure appropriate operator response?				X
32	480-93-200(7)(a)	Does the operator report to the commission the requirements set forth in RCW 19.122.053(3) (a) through (n)				X
33	480-93-200(7)(b)	Does the operator report the name, address, and phone number of the person or entity that the company has reason to believe may have caused damage due to excavations conducted <u>without facility locates</u> first being completed?				X
34	480-93-200(7)(c)	Does the operator retain all damage and damage claim records it creates related to damage events reported under 93-200(7)(b), including photographs and documentation supporting the conclusion that a facilities locate was not completed? <b>Note:</b> Records maintained for two years and made available to the commission upon request.				X
35	480-93-200(8)	Does the operator provide the following information to excavators who damage gas pipeline facilities?				
36	480-93-200(8)(a)	<ul style="list-style-type: none"> <li>Notification requirements for excavators under RCW 19.122.050(1)</li> </ul>				X
37	480-93-200(8)(b)	<ul style="list-style-type: none"> <li>A description of the excavator's responsibilities for reporting damages under RCW 19.122.053; and</li> </ul>				X
38	480-93-200(8)(c)	<ul style="list-style-type: none"> <li>Information concerning the safety committee referenced under RCW 19.122.130, including committee contact information, and the process for filing a complaint with the safety committee.</li> </ul>				X
39	480-93-200(9)	<b>Reports to the commission only when the operator or its contractor observes or becomes aware of the following activities...</b> <ul style="list-style-type: none"> <li>An excavator digs within thirty-five feet of a transmission pipeline, as defined by RCW 19.122.020(26) without first obtaining a facilities locate; (200(9)(a)</li> <li>A person intentionally damages or removes marks indicating the location or presence of gas pipeline facilities. 200(9)(b)</li> </ul>				X
40	480-93-200(7)	<b>Filing Reports of Damage to Gas Pipeline Facilities to the commission. (eff 4/1/2013)</b> (Via the commission's Virtual DIRT system or on-line damage reporting form)				X
41	442(c)(6)	Does the operator have directional drilling/boring procedures which include taking actions necessary to protect their facilities from the dangers posed by drilling and other trenchless technologies?				X
42	<b>Damage Prevention (Operator Internal Performance Measures) PHMSA – State Program Evaluation Questions</b>	Does the operator have a quality assurance program in place for monitoring the locating and marking of facilities? Do operators conduct regular field audits of the performance of locators/contractors and take action when necessary? (CGA Best Practices v. 6.0, Best Practice 4-18. Recommended only, not required) ***Notes - We reviewed a record. They get notices within a mile. No mis-locates have occurred.***	X			
43		Does operator including performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties? ***Notes – locating contractors are not used***				X
44		Do locate contractors address performance problems for persons performing locating services through mechanisms such as re-training, process change, or changes in staffing levels***Notes – locating contractors are not used***				X
45		Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates?	X			

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46		Review operator locating and excavation <u>procedures</u> for compliance with state law and regulations.	X			
47		Are locates are being made within the timeframes required by state law and regulations? Examine record sample. <b>***Notes - We reviewed a record. They get notices within a mile. No mis-locates have occurred.***</b>	X			
48		Are locating and excavating personnel properly <u>qualified</u> in accordance with the operator's Operator Qualification plan and with federal and state requirements?	X			
49	480-93-200(10)	<b>Annual Reports</b> filed with the commission no later than <b>March 15</b> for the proceeding calendar year. <i>(NOTE: PHMSA extension to June 15, 2013 for the year 2012).</i>	S	U	N/A	N/C
50	480-93-200(10)(a)	A copy of PHMSA F-7100.1-1 and F-7100.2-1 annual report required by U.S. Department of Transportation, PHMSA/Office of Pipeline Safety . <b>***Notes - Submitted 2/5/2018, 3/12/2019, 3/12/2020</b>	X			
51	49 CFR 195.402	Did the operator follow written procedures pertaining to notification of excavation, marking, positive response ant the availability and use of the one call system? <b>***Notes – Simplot gets about 12 or so to investigate a year and marked 5 for 2019***</b>	X			
52	480-93-200(10)(b)	Reports detailing all construction defects and material failures resulting in leakage. Categorizing the different types of construction defects and material failures. The report must include the following: (i) Types and numbers of construction defects; and (ii) Types and numbers of material failures. <b>***Notes No construction defects or material failures have occurred during the inspection time period.***</b>			X	
53	480-93-200(11)	Providing updated emergency contact information to the commission and appropriate officials of all municipalities where gas pipeline companies have facilities... <b>***Notes - No changes***</b>	X			
54	480-93-200(12)	Providing by email, reports of daily construction and repair activities no later than 10:00 a.m. <b>***Notes – No construction or repair has occurred during this inspection time period***</b>			X	
55	480-93-200(13)	Submitting copy of DOT Drug and Alcohol Testing MIS Data Collection Form when required <b>***Notes – MIS reviewed***</b>	X			

**Comments:**  
**\*\*\*Notes – #31-34, 36-41 – No incidents have occurred during the inspection time period.\*\*\***

<b>CONSTRUCTION RECORDS</b>			S	U	N/A	N/C
56.	480-93-080(1)(b)	Use of testing equipment to record and document essential variables			X	
57.	480-93-115(2)	Test leads on casings (without vents) installed after 9/05/1992			X	
58.	480-93-115(3)	Sealing ends of casings or conduits on transmission pipelines and main			X	
59.	480-93-115(4)	Sealing ends (nearest building wall) of casings or conduits on services			X	
60.	480-93-160(1)	Detailed report filed 45 days prior to construction or replacement of transmission pipelines ≥ 100 feet in length			X	
61.	480-93-170(3)	Pressure Tests Performed on new and replacement pipelines			X	
62.	480-93-170(10)	Pressure Testing Equipment checked for Accuracy/Intervals (Manufacturers recommendation or operators schedule)			X	
63.	480-93-175(1)	Study prepared and approved prior to moving and lowering of metallic pipelines > 60 psig			X	

**Comments: \*\*\*Notes – #56-63 No construction or repair has occurred during this inspection time period\*\*\***

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OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C								
<b>64.</b>	<b>Damage Prevention Program</b>													
<b>65.</b>	480-93-250(3)	Are locates are being made within the timeframes required by RCW 19.122? Examine record sample. <b>***Notes – Repeat question – reference question 47***</b>				X								
<b>66.</b>	480-93-015(1)	Odorization of Gas – Concentrations adequate?			X									
<b>67.</b>	480-93-015(2)	Monthly Odorant Sniff Testing			X									
<b>68.</b>	480-93-015(3)	Prompt action taken to investigate and remediate odorant concentrations not meeting the minimum requirements			X									
<b>69.</b>	480-93-015(4)	Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation)			X									
<b>70.</b>	480-93-124(3)	Pipeline markers attached to bridges or other spans inspected? <b>1/yr(15 months)</b>			X									
<b>71.</b>	480-93-124(4)	Markers reported missing or damaged replaced within <b>45 days?</b> <b>***Notes – some markers were replaced and relabeled.***</b>	X											
<b>72.</b>	480-93-185(1)	Reported gas leaks investigated promptly/graded/record retained			X									
<b>73.</b>	480-93-185(3)	Leaks originating from a foreign source reported promptly/notification by mail/record retained			X									
<b>74.</b>	480-93-187	Gas Leak records - Content	X											
<b>75.</b>	480-93-188(1)	Gas Leak surveys - Coverage	X											
<b>76.</b>	480-93-188(2)	Gas detection instruments tested for accuracy/intervals (Mfct rec or monthly not to exceed 45 days) <b>***Notes – The Track-its perform a self check and are calibrated every two years.***</b>	X											
<b>77.</b>	480-93-188(3)	Leak survey frequency (Refer to Table Below) <b>***Notes – Performed October 7<sup>th</sup> and June 13<sup>th</sup> 2019, April 12<sup>th</sup> 2018, May 7<sup>th</sup> 2017, Nov 6<sup>th</sup> 2017***</b>	X											
<table border="1" style="margin: auto; border-collapse: collapse;"> <tr> <td style="padding: 5px;"><b>Business Districts (By 6/02/07)</b></td> <td style="padding: 5px; text-align: center;"><b>1/yr (15 months)</b></td> </tr> <tr> <td style="padding: 5px;"><b>High Occupancy Structures</b></td> <td style="padding: 5px; text-align: center;"><b>1/yr (15 months)</b></td> </tr> <tr> <td style="padding: 5px;"><b>Pipelines Operating ≥ 250 psig</b></td> <td style="padding: 5px; text-align: center;"><b>1/yr (15 months)</b></td> </tr> <tr> <td style="padding: 5px;"><b>Other Mains: CI, WI, copper, unprotected steel</b></td> <td style="padding: 5px; text-align: center;"><b>2/yr (7.5 months)</b></td> </tr> </table>							<b>Business Districts (By 6/02/07)</b>	<b>1/yr (15 months)</b>	<b>High Occupancy Structures</b>	<b>1/yr (15 months)</b>	<b>Pipelines Operating ≥ 250 psig</b>	<b>1/yr (15 months)</b>	<b>Other Mains: CI, WI, copper, unprotected steel</b>	<b>2/yr (7.5 months)</b>
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<b>78.</b>	480-93-188(4)(a)	Special leak surveys - Prior to paving or resurfacing, following street alterations or repairs			X									
<b>79.</b>	480-93-188(4)(b)	Special leak surveys - areas where substructure construction occurs adjacent to underground gas facilities, and damage could have occurred			X									
<b>80.</b>	480-93-188(4)(c)	Special leak surveys - Unstable soil areas where active gas lines could be affected			X									
<b>81.</b>	480-93-188(4)(d)	Special leak surveys - areas and at times of unusual activity, such as earthquake, floods, and explosions			X									
<b>82.</b>	480-93-188(4)(e)	Special leak surveys - After third-party excavation damage, operators must perform a gas leak survey to eliminate the possibility of multiple leaks and underground migration into nearby buildings.			X									
<b>83.</b>	480-93-188(5)	Gas survey records: Retention/Content <b>****Notes – Leak Survey records are kept at least five years****</b>	X											
<b>84.</b>	480-93-188(6)	Leak Survey Program/Self Audits <b>****Notes – These were historically performed by CCI, the consultant, and will be either performed in-house of by the new consultant.***</b>	X											

<b>Comments: ***Notes –#66-70,72, 73, 78-82 None of these conditions existed or events occurred during this inspection time period***</b>
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CORROSION CONTROL RECORDS			S	U	N/A	N/C
85.	480-93-110(8)	CP test reading on all exposed facilities where coating has been removed			X	
86.	480-93-110(2)	Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) .465(d)			X	
87.	480-93-110(3)	CP Test Equipment and Instruments checked for Accuracy/Intervals (Mfct Rec or Opr Sched)			X	
88.	480-93-110(5)	Casings inspected/tested annually not to exceed fifteen months			X	
89.	480-93-110(5)(a)	Casings w/no test leads installed prior to 9/05/1992. Demonstrate other acceptable test methods			X	
90.	480-93-110(5)(b)	Possible shorted conditions – Perform confirmatory follow-up inspection within 90 days			X	
91.	480-93-110(5)(c)	Casing shorts cleared when practical			X	
92.	480-93-110(5)(d)	Shorted conditions leak surveyed within 90 days of discovery. Twice annually/7.5 months			X	

<b>Comments:</b> ***Notes – 85-92 This is a polyethylene system.***
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PIPELINE INSPECTION (Field)			S	U	N/A	N/C
93.	480-93-015(1)	Odorization levels ***Notes – Reference previous inspection. Odorant is natural from Sulphur by-products***			X	
94.	480-93-115(2)	Casings – Test Leads (Casings w/o vents installed after 9/05/1992) ***Notes – This is a polyethylene system.***			X	

<b>Comments:</b>
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EXIT INTERVIEW	
Exit Interview Conducted? Yes Items Covered: Inspection Q&A, when the next O&M is coming out, .etc	Date: 3/17/2020

For PHMSA Advisory Bulletins, go to <https://www.phmsa.dot.gov/regulations-fr/notices>