

Inspection Output (IOR)

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Inspection Information

Inspection Name	Cascade DIMP 8054	Operator(s)	CASCADE NATURAL GAS CORP (2128)	Plan Submitted	11/20/2019
Status	PLANNED	Lead	Scott Rukke	Plan Approval	01/02/2020 by Joe Subsits
Start Year	2020	Team Members	David Cullom, Dennis Ritter, Lex Vinsel, Anthony Dorrough, Derek Norwood, Scott Anderson, Darren Tinnerstet	All Activity Start	01/13/2020
System Type	GD	Observer(s)	Deborah Becker, Rell Koizumi	All Activity End	01/17/2020
Protocol Set ID	GD.2019.01	Supervisor	Joe Subsits	Inspection Submitted	--
		Director	Sean Mayo	Inspection Approval	--

Inspection Summary

This is a CNG headquarters biennial Distribution Integrity Management Program inspection.

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CNGC's accelerated pipeline replacement program (PRP plan) includes the following types of pipe to be placed on an accelerated replacement plan based on risk scores:

EVSP is steel mains, service lines, and associated fittings installed earlier than 1/1/1970. These pipeline segments present an increased risk of failure due to aging and/or obsolete pipelines.

CNGC has a fairly aggressive PRP that has accelerated on the miles of pipe replaced each year for the last 5 years.

Reviewed and uploaded documents include 2016 - 2018 Annual Reports, 2016 - 2018 Mechanical Fitting Failure Reports, 2016 - 2018 Construction Defect Reports.

No noticeable trends were identified.

IA question sets were revised on 1/2/2020 and sent to Sam Hamilton. This was due to a major IA revision that added additional questions.

First day in their office is 1/14/2020. Drive day on 1/13/2020 and 1/15/2020

Exit interview on 1/14/2020

Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1.	CNG DIMP 8054	Cascade Natural Gas - Headquarters	unit	88961	Compressor Stations Storage Fields Bottle/Pipe - Holders Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum pipe Abandoned	84	84	84	84	100.0%

1. Percent completion excludes unanswered questions planned as "always observe".

Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent Notes
1.	CNG DIMP 8054	n/a	GDIM.RR, GDIM.IMPL, GDIM.TH, GDIM.KN, GDIM.EV, GDIM.PE, GDIM.PM, GDIM.RC, GDIM.MF, GDIM.RP, GDIM.RA.SOURCES.P	P, R, O	Detail

Plan Implementations

#	Activity Name	SMAR T Act#	Start Date	Focus Directives	Involved Groups/Subgroups	Asset Types	Qst Type(s)	Planned	Required	Inspected	Total	Required % Complete
1.	Office Records and Program Review	--	01/13/2020 01/17/2020 20	n/a	all planned questions	all asset types		84	84	84	84	100.0%

1. Since questions may be implemented in multiple activities, but answered only once, questions may be represented more than once in this table.

2. Percent completion excludes unanswered questions planned as "always observe".

Forms

No. Entity	Form Name	Status	Date Completed	Activity Name	Asset
1. Attendance List	Office Records and Program Review	COMPLETED	01/15/2020	Office Records and Program Review	CNG DIMP 8054

Results (all values, 84 results)

85 (instead of 84) results are listed due to re-presentation of questions in more than one sub-group.

PRR.REPORT: Reporting

- Question Result, ID, References **Sat, GDIM.RR.MECHANICALFITTINGDATAIMPL.R, 192.1009 (191.12)** (also presented in: GDIM.IMPL)
 - Question Text *Have accurate records been maintained documenting mechanical fitting failures that resulted in hazardous leaks?*
 - Assets Covered **CNG DIMP 8054**
 - Result Notes **Stored in Appendix J.**

GDIM.IM: Plan Implementation

- Question Result, ID, References **Sat, GDIM.RA.SOURCES.P, 192.1007(a)(1)**
 - Question Text *Do the procedures identify or reference the appropriate sources used to determine certain characteristics (e.g., Design, Operating Conditions, Operating Environmental Factors) necessary to assess the threats and risks to the pipeline?*
 - Assets Covered **CNG DIMP 8054**
 - Result Notes **Section 2 - Knowledge of the system.**

GDIM.KN: Knowledge of the System

- Question Result, ID, References **Sat, GDIM.RA.GAPS.P, 192.1007(a)(3)**
 - Question Text *Does the plan contain procedures to identify additional information that is needed to fill gaps due to missing, inaccurate, or incomplete records?*
 - Assets Covered **CNG DIMP 8054**
 - Result Notes **Section 2.6.1 of the plan and Table 6.1 of Appendix B lists areas if insufficient/missing data as well as who is responsible for implementation.**
- Question Result, ID, References **Sat, GDIM.RA.INFORMATION.P, 192.1007(a)(2)**
 - Question Text *Do the procedures require the consideration of information gained from past design, operations, and maintenance (e.g. O&M activities, field surveys, One-Call system information, excavation damage, etc.)?*
 - Assets Covered **CNG DIMP 8054**
 - Result Notes **Sections 2.6 and 6.1.**
- Question Result, ID, References **Sat, GDIM.RA.INFONEEDS.P, 192.1007(a)(3)**
 - Question Text *Do the procedures specify the means to collect the additional information needed to fill gaps due to missing, inaccurate, or incomplete records (e.g., O&M activities, field surveys, One-Call System, etc.)?*
 - Assets Covered **CNG DIMP 8054**
 - Result Notes **Section 6 has the "Plan to Acquire Data table.**
- Question Result, ID, References **Sat, GDIM.RA.INFONEEDS.R, 192.1007(a)(3)**
 - Question Text *Does the plan list the additional information needed to fill gaps due to missing, inaccurate, or incomplete records?*
 - Assets Covered **CNG DIMP 8054**
 - Result Notes **Listed in Section 6.1 Appendix B**

7. Question Result, ID, References **Sat, GDIM.RA.NEWPIPEDATA.P, 192.1007(a)(5)**
 Question Text *Do the procedures require the capture and retention of data on any new pipeline installed?*
 Assets Covered **CNG DIMP 8054**
8. Question Result, ID, References **Sat, GDIM.RA.NEWPIPEDATA.R, 192.1007(a)(5)**
 Question Text *Does the data required for capture and retention include, at a minimum, the location where the new pipeline is installed and the material from which it is constructed?*
 Assets Covered **CNG DIMP 8054**
 Result Notes **Reviewed random sampling of as built records and the information was recorded.**
9. Question Result, ID, References **Sat, GDIM.RA.DEMOKNOWLEDGE.R, 192.1007(a)**
 Question Text *Do records demonstrate implementation of the element "Knowledge of the System"?*
 Assets Covered **CNG DIMP 8054**
 Result Notes **Found in multiple sections. Section 2 Appendix B. Appendix B Threat ID. Risk ID Appendix D**
10. Question Result, ID, References **Sat, GDIM.RA.DEMOUNDERSTANDING.R, 192.1007(a)**
 Question Text *Has the operator demonstrated an adequate understanding of the system?*
 Assets Covered **CNG DIMP 8054**
 Result Notes **Good understanding of their system issues.**

GDIM.TH: Identify Threats

11. Question Result, ID, References **Sat, GDIM.RA.THREATCATEGORIES.P, 192.1007(b)**
 Question Text *In identifying threats, do the procedures include consideration of all of the required threat categories to each gas distribution pipeline?*
 Assets Covered **CNG DIMP 8054**
 Result Notes **Identified in Section 3.1.**
12. Question Result, ID, References **Sat, GDIM.RA.INFOCONSIDERED.P, 192.1007(b)**
 Question Text *Did the operator consider the information that was reasonably available to identify existing and potential threats?*
 Assets Covered **CNG DIMP 8054**
 Result Notes **Section 4. of Appendix C.**
13. Question Result, ID, References **Sat, GDIM.RA.INFOCONSIDERED.R, 192.1007(b)**
 Question Text *In identifying threats did the information considered include all of the required data and information sources?*
 Assets Covered **CNG DIMP 8054**
 Result Notes **Appendix B and Appendix C**
14. Question Result, ID, References **Sat, GDIM.RA.OUTSIDESOURCES.P, 192.1007(b)**
 Question Text *Do the procedures consider, in addition to the operator's own information, data from external sources (e.g. trade associations, government agencies, or other system operators, etc.) to assist in identifying potential threats?*
 Assets Covered **CNG DIMP 8054**
 Result Notes **3.4.1 Plan Documented in Table 4.1 of Appendix C lists potential threats.**
15. Question Result, ID, References **Sat, GDIM.RA.IMPLEMENTTH.R, 192.1007(b)**
 Question Text *Do records demonstrate implementation of the element "Identify Threats"?*
 Assets Covered **CNG DIMP 8054**
 Result Notes **Yes. CNG has done a good job of identifying threats and potential threats to their system. They have numerous active pipeline replacement programs and are meeting their baseline threat reduction goals.**

GDIM.RR: Evaluate and Rank Risk

16. Question Result, ID, References Sat, GDIM.RA.RISKRANKING.P, 192.1007(c)
Question Text *Do the procedures contain the method(s) used to determine the relative importance of each threat and estimate and rank the risks posed?*
Assets Covered CNG DIMP 8054
Result Notes Section 4 Risk Evaluation and Ranking. CNG uses ESRI. 4.2.2 and 4.3.3.
17. Question Result, ID, References Sat, GDIM.RA.THREATSCONSIDERED.P, 192.1007(c)
Question Text *Do the procedures to evaluate and rank risk consider each applicable current and potential threat?*
Assets Covered CNG DIMP 8054
Result Notes In section 3. Documented in Appendix C. Evaluating and ranking is in Section 4. Table D of appendix 3.1 covers current threats.
18. Question Result, ID, References Sat, GDIM.RA.LIKELIHOOD.P, 192.1007(c)
Question Text *Do the procedures to evaluate and rank risk consider the likelihood of failure associated with each threat?*
Assets Covered CNG DIMP 8054
19. Question Result, ID, References Sat, GDIM.RA.CONSEQUENCE.P, 192.1007(c)
Question Text *Do the procedures to evaluate and rank risk consider the potential consequence of failure for all applicable threats?*
Assets Covered CNG DIMP 8054
Result Notes Likelihood section 4.2.3, Table 3.1 of appendix D scores the threats individually.
20. Question Result, ID, References Sat, GDIM.RA.SUBDIVIDE.R, 192.1007(c)
Question Text *If subdivision of system occurs, does the plan subdivide the system into regions with similar characteristics and for which similar actions are likely to be effective in reducing risk?*
Assets Covered CNG DIMP 8054
Result Notes 3.3 covers subdividing. Appendix D

D3.1 breaks it down by threat. An example of subdivision is eastern WA vs Western WA where the corrosion rate is much higher due to soil and rain conditions.
21. Question Result, ID, References Sat, GDIM.RA.RESULTS.R, 192.1007(c)
Question Text *Are the results of the risk ranking supported by the risk evaluation model/method?*
Assets Covered CNG DIMP 8054
Result Notes Outputs are supported by the SME panel. 1.6.2 of the plan. Meetings documented in appendix C section 4. Model validation is in section 4.
22. Question Result, ID, References Sat, GDIM.RA.RESULTSVALIDATION.R, 192.1007(c)
Question Text *Did the operator validate the results generated by the risk evaluation model/method?*
Assets Covered CNG DIMP 8054
Result Notes 4.4 of the plan documented in section 5 of appendix D.
23. Question Result, ID, References Sat, GDIM.RA.IMPLEMENTRR.R, 192.1007(c)
Question Text *Do records demonstrate implementation of the element "Evaluate and Rank Risk"?*
Assets Covered CNG DIMP 8054
Result Notes Yes.

GDIM.PM: Preventive and Mitigative Actions

24. Question Result, ID, References Sat, GDIM.PM.IDENTIFYMEASURES.P, 192.1007(d)

Question Text *Does the plan include procedures to identify when measures, beyond minimum code requirements specified outside of Part 192 Subpart P, are required to reduce risk?*

Assets Covered CNG DIMP 8054

Result Notes Section 6.5. Documented in Appendix H 3.1. CNG conducts AA reviews if in any year their baseline trends more than 25%. I reviewed a sampling of these. No issues.

25. Question Result, ID, References Sat, GDIM.PM.IDENTIFYMEASURES.R, 192.1007(d)

Question Text *When measures, beyond minimum code requirements specified outside of Part 192 Subpart P, are required to reduce risk, does the plan identify the measures selected, how they will be implemented, and the risks they are addressing?*

Assets Covered CNG DIMP 8054

Result Notes For 2018 there were no additional accelerated actions. In 2016 and 2017 there were a couple.

26. Question Result, ID, References Sat, GDIM.PM.LEAKMANAGEMENT.P, 192.1007(d)

Question Text *Does the plan include an effective leak management program (unless all leaks are repaired when found)?*

Assets Covered CNG DIMP 8054

Result Notes Trended in Appendix H.

27. Question Result, ID, References Sat, GDIM.PM.IMPLEMENTPM.R, 192.1007(d)

Question Text *Do records demonstrate implementation of the measures, required by Part 192 Subpart P, to reduce risk?*

Assets Covered CNG DIMP 8054

Result Notes Performance measures are mostly trending down for risk. AA's that have been implemented are working. Any upward trends are analyzed and monitored or additional AA's are implemented.

GDIM.EV: Measure Performance and Evaluate Effectiveness

28. Question Result, ID, References Sat, GDIM.QA.PERFMEASUREBASELINE.P, 192.1007(e)

Question Text *Does the plan contain procedures for how the operator established a baseline for each performance measure?*

Assets Covered CNG DIMP 8054

Result Notes Appendix H 3.1.2.

29. Question Result, ID, References Sat, GDIM.QA.PERFMEASUREBASELINE.R, 192.1007(e)

Question Text *Does the plan establish a baseline for each performance measure?*

Assets Covered CNG DIMP 8054

Result Notes Appendix H.

30. Question Result, ID, References Sat, GDIM.QA.PERFMEASUREDATA.P, 192.1007(e)

Question Text *Does the operator have procedures to collect the data for each performance measure?*

Assets Covered CNG DIMP 8054

Result Notes Section 6.1 and 6.4

31. Question Result, ID, References Sat, GDIM.QA.PERFMEASUREMONITOR.P, 192.1007(e)

Question Text *Do the procedures require the operator to monitor each performance measure?*

Assets Covered CNG DIMP 8054

Result Notes Yes

32. Question Result, ID, References Sat, GDIM.QA.MEASUREEFFECTIVENESS.P, 192.1007(e)

Question Text *When measures are required to reduce risk, do the procedures provide how their effectiveness will be measured?*

Assets Covered CNG DIMP 8054

Result Notes Yes. When accelerated actions are implemented. 6.5.2 and 5.2 of Appendix F.

33. Question Result, ID, References **Sat, GDIM.QA.IMPLEMENTEV.R, 192.1007(e)**
Question Text *Do records demonstrate implementation of the element "Measure Performance, Monitor Results, and Evaluate Effectiveness"?*
Assets Covered **CNG DIMP 8054**
Result Notes **Yes. Measures are monitored, tracked, modified when necessary and risk is being reduced.**

GDIM.PE: Periodic Evaluation

34. Question Result, ID, References **Sat, GDIM.CA.PERIODICEVAL.P, 192.1007(f)**
Question Text *Do the procedures for periodic evaluation include all of the requirements of 192.1007(f)?*
Assets Covered **CNG DIMP 8054**
Result Notes **A 5 year program re-evaluation was conducted in 2016. Appendix I documents results.**

35. Question Result, ID, References **Sat, GDIM.CA.PERIODICEVAL.R, 192.1007(f)**
Question Text *Do records demonstrate implementation of the element "Periodic Evaluation and Improvement"?*
Assets Covered **CNG DIMP 8054**
Result Notes **1. 4.2.1 requires updated model every 15 months.**

1) must re-evaluate threats and risks on its entire pipeline-must re-evaluate threats and risks on its entire pipeline

2) appropriate period for conducting complete program evaluations: Risk model is run annually, then plan is updated by March 31 of every year

3) An operator must conduct a complete program re-evaluation at least every five years. Section 7.1 documented in Appendix I. Last completed 7/21/16. Signed off by VPs of Ops for CNG, IGC, MDU

4) must consider the results of the performance monitoring in these evaluations: DIMP model annually reviewed, performance measures tracked and trended.

NOTE: added specific threats to the 2018 review of the DIMP model for:

1) vintage 2" weld quality--

2) frost and earth movement-external stresses on vintage welds

3) MAOP validating leak test

GDIM.RP: Reporting

36. Question Result, ID, References **Sat, GDIM.RR.ANNUALREPORT.P, 192.1007(g)**
Question Text *Does the plan contain or reference procedures for reporting, on an annual basis, the four measures listed in 192.1007(e)(1)(i) through (e)(1)(iv) to PHMSA as part of the annual report required by 191.11 and the State regulatory authority?*
Assets Covered **CNG DIMP 8054**
Result Notes **Section 9.0 Plan and Appendix H, Appendix K has annual reports.**

37. Question Result, ID, References **Sat, GDIM.RR.SUBMITREPORTS.R, 192.1007(g)**
Question Text *Has the operator submitted the required reports?*
Assets Covered **CNG DIMP 8054**

Result Notes I reviewed all required reports for 2016, 2017 and 2018.

Section 9.0 Plan and Appendix H, Appendix K has annual reports.

GDIM.MF: Report Mechanical Fitting Failures

38. Question Result, ID, References **Sat, GDIM.RR.MECHANICALFITTING.P, 192.1009**
Question Text *Are there procedures to collect information necessary to comply with the reporting requirements of 192.1009?*
Assets Covered **CNG DIMP 8054**
Result Notes **Covered in Section 8.0 Plan for collecting data and reporting is Section 9.0. Appendix J Mechanical Coupling failures also references CP 722.**

GDIM.RC: Records Required to be Kept

39. Question Result, ID, References **Sat, GDIM.QA.RECORDREQUIREMENTS.P, 192.1011**
Question Text *Are there procedures specifying which records demonstrating compliance with Subpart P will be maintained for at least 10 years?*
Assets Covered **CNG DIMP 8054**
Result Notes **Section 10.**
40. Question Result, ID, References **Sat, GDIM.QA.PLANRETENTION.P, 192.1011**
Question Text *Are there procedures specifying that copies of superseded integrity management plans will be maintained for at least 10 years?*
Assets Covered **CNG DIMP 8054**
Result Notes
 - **Section 10.**
41. Question Result, ID, References **Sat, GDIM.QA.RECORDREQUIREMENTS.R, 192.1011**
Question Text *Has the operator maintained the required records?*
Assets Covered **CNG DIMP 8054**

GDIM.IMPL: GDIM Implementation

42. Question Result, ID, References **Sat, GDIM.QA.ISSUESIMPL.R, 192.1005**
Question Text *Have all issues raised in previous DIMP inspections been satisfactorily addressed?*
Assets Covered **CNG DIMP 8054**
Result Notes **All issues are resolved.**
43. Question Result, ID, References **Sat, GDIM.RA.GAPSIMPL.R, 192.1007(a)(3)**
Question Text *Is missing or incomplete system information and data needed to fill knowledge gaps to assess existing and potential threats being collected?*
Assets Covered **CNG DIMP 8054**
Result Notes **Appendix B Knowledge of System Section 6.0 Insufficient/missing data. Table B6.1 identifies which record is used to fill in missing gaps--eg Form 625 for coating and pipe condition. Reviewed several Forms used to collect data-Form 625, Form 293 for leaks.**
44. Question Result, ID, References **Sat, GDIM.RA.OUTSIDESOURCESIMPL.R, 192.1007(b)**
Question Text *Has the operator identified information or data from external sources (e.g. trade associations, operator's consultants, government agencies, other operators, manufacturers, etc.) that may require re-evaluation of threats and risks?*
Assets Covered **CNG DIMP 8054**
Result Notes **In 2018 new model evaluations were used. Keifner was used on outside force on welds issues.**

45. Question Result, ID, References **Sat, GDIM.RA.SYSINFONEEDSIMPL.R, 192.1007(a)(3)**
 Question Text *Is missing or incomplete system information and data using the procedures prescribed in the DIMP plan being collected?*
 Assets Covered **CNG DIMP 8054**
 Result Notes **MAOP validation is an example of missing information that is being collected such as grade of pipe to validate the MAOP of pipeline segments.**
46. Question Result, ID, References **Sat, GDIM.RA.OMINFONEEDSIMPL.R, 192.1007(a)(3)**
 Question Text *Has any new or missing information identified or acquired during normal operations, maintenance, and inspection activities been incorporated into the DIMP plan?*
 Assets Covered **CNG DIMP 8054**
 Result Notes
 - **During yearly model runs all new data is entered into their DIMP model.**
47. Question Result, ID, References **Sat, GDIM.RA.NEWPIPEIMPL.R, 192.1007(a)(5)**
 Question Text *Have required data on any new pipeline installations since August 2, 2011 been captured (e.g., location, wall thickness/SDR, manufacturer, lot/production number)?*
 Assets Covered **CNG DIMP 8054**
48. Question Result, ID, References **Sat, GDIM.RA.DATAFORMIMPL.R, 192.1007(a)**
 Question Text *Are data collection forms used in conjunction with the operator's DIMP plan being fully and accurately completed?*
 Assets Covered **CNG DIMP 8054**
 Result Notes **Reviewed form 21760 AA Action Implementation (Appendix F)**

21761 DIMP Review Summary (Appendix I)

Form 21762 SME discussions for Risk model Calculations update

Form 21764 SME Panel discussions--East side and West side
49. Question Result, ID, References **Sat, GDIM.RA.SMEIMPL.R, 192.1007(a)**
 Question Text *If new Subject Matter Experts (SMEs) input is incorporated into the DIMP plan, do SMEs have the necessary knowledge and/or experience (skills sets) regarding the areas of expertise for which the SME provided knowledge or supplemental information for input into the DIMP plan?*
 Assets Covered **CNG DIMP 8054**
 Result Notes **Reviewed SME input for risk model calculation update.**
50. Question Result, ID, References **NC, GDIM.RA.DEMOUNDERSTANDINGIMPL.O, 192.1007(a)**
 Question Text *Do operator personnel in the field understand their responsibilities under the DIMP plan?*
 Assets Covered **CNG DIMP 8054**
 Result Notes **Did not field check personnel. This will be done during district inspections later this year.**
51. Question Result, ID, References **Sat, GDIM.RA.THREATCATEGORIESIMPL.R, 192.1007(b)**
 Question Text *Has the operator acquired any new information relevant to system knowledge that may affect its threat identification?*
 Assets Covered **CNG DIMP 8054**
52. Question Result, ID, References **Sat, GDIM.RA.INFOCONSIDEREDIMPL.R, 192.1007(b)**
 Question Text *Have any changes occurred that require re-evaluation of threats and risks?*
 Assets Covered **CNG DIMP 8054**
 Result Notes **CNG is currently evaluating some risks as example permalock tees in the Mt Vernon District. They have not re-evaluated their threats and are still gathering information.**

53. Question Result, ID, References **NA, GDIM.RA.IMPLEMENTTHUPDATEIMPL.R, 192.1007(c)**
 Question Text *Since the last DIMP plan review by the regulatory agency, has the threat identification and risk assessment been updated based on newly acquired information or data relevant to system knowledge?*
 Assets Covered **CNG DIMP 8054**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
54. Question Result, ID, References **NA, GDIM.RA.IMPLEMENTTHUPDATEPLANIMPL.R, 192.1007(c)**
 Question Text *If the threat identification and risk evaluation and ranking have been modified, were the revisions made in accordance with the procedure in the DIMP plan?*
 Assets Covered **CNG DIMP 8054**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
55. Question Result, ID, References **Sat, GDIM.RA.SUBDIVIDEADEQIMPL.R, 192.1007(c)**
 Question Text *Does the current subdivision process (grouping of materials, geographic areas, etc.) adequately meet the need to properly evaluate and rank the existing and potential threats to the integrity of the system?*
 Assets Covered **CNG DIMP 8054**
 Result Notes **Sudivide into threats, subthreats, the 50x50 grid, the pipe coloring, thicker boarder on pre-CNG pipe-- many subdivisions. Each risk score is relative to every risk score-a score.**
56. Question Result, ID, References **NA, GDIM.RA.SUBDIVIDEUPDATEIMPL.R, 192.1007(c)**
 Question Text *Have the system subdivisions within the risk evaluation and ranking been added to or modified since the last plan review by the regulatory agency?*
 Assets Covered **CNG DIMP 8054**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
57. Question Result, ID, References **NA, GDIM.RA.SUBDIVIDEDIMPIMPL.R, 192.1007(c)**
 Question Text *If system subdivisions have been added or modified, was it done in accordance with the procedures described in the DIMP plan?*
 Assets Covered **CNG DIMP 8054**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
58. Question Result, ID, References **NA, GDIM.RA.SUBDIVIDERESULTIMPL.R, 192.1007(c)**
 Question Text *If system subdivisions have been added or modified, did the new system subdivision result in modifications to the risk evaluation and ranking?*
 Assets Covered **CNG DIMP 8054**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
59. Question Result, ID, References **Sat, GDIM.PM.IMPLEMENTPMIMPL.R, 192.1007(d)**
 Question Text *Does documentation reviewed demonstrate that measures to reduce risks per the DIMP plan are being implemented?*
 Assets Covered **CNG DIMP 8054**
 Result Notes **CNG has a large pipe replacement program that has accelerated in the last 5 years partially due to the PRP plan initiated by the Commission.**
60. Question Result, ID, References **Sat, GDIM.PM.IMPLEMENTPMCOMPLETEIMPL.R, 192.1007(d)**
 Question Text *Have any measures to reduce risks resulting in the elimination/mitigation of the associated identified threat been completed (e.g., pipe replacement program completed, etc.)?*
 Assets Covered **CNG DIMP 8054**
 Result Notes **Trends are down due to many phases of Pipe replacements for pre-CNG and bare steel programs in Longview, Anacortes, Kelso, Shelton.**
- MAOP validation program to supply missing information-pressure testing, pipe replacement, pipe characteristics (ADB ball indentation)**

61. Question Result, ID, References **Sat, GDIM.PM.IMPLEMENTPMREEVALIMPL.R, 192.1007(d)**
 Question Text *If answering "Satisfactory/Yes" to previous question implementation question GDIM.PM.IMPLEMENTPMCOMPLETEIMPL.R, have risks (192.1007(c)) been re-evaluated and ranked because of the elimination/mitigation of an identified threat to ensure that risk reduction measures in place are appropriate?*
 Assets Covered **CNG DIMP 8054**
 Result Notes **DIMP risk model is re-run annually incorporating in the reduction of high risk pipe by reducing the threats--bare steel/poorly coateds steel replacement program. DIMP model output shows change from red(high risk) to green (low risk) due to replacement of pipe.**
62. Question Result, ID, References **Sat, GDIM.PM.IMPLEMENTPMSPECIFRISKIMPL.R, 192.1007(d)**
 Question Text *Does each implemented risk reduction measure identified in the DIMP plan address a specific risk?*
 Assets Covered **CNG DIMP 8054**
 Result Notes **Appendix F, table A4.1 shows specific reduction in risk for each district implementing corrosion reduction, missing value, excavation measure.**
63. Question Result, ID, References **Sat, GDIM.PM.LEAKMANAGEMENTIMPL.R, 192.1007(d)**
 Question Text *Can the operator provide documentation to demonstrate that an effective leak management program is being implemented (answer "N/A" if all leaks are repaired when found)?*
 Assets Covered **CNG DIMP 8054**
 Result Notes **Reviewed during district inspections.**
64. Question Result, ID, References **Sat, GDIM.QA.IMPLEMENTEVDATAIMPL.R, 192.1007(e)**
 Question Text *Is data being collected for the required performance measures in 192.1007(e)?*
 Assets Covered **CNG DIMP 8054**
 Result Notes **Appendix H. Data is being colleted for the six required performance measures listed in code. Appendix H lists the data collected to support the required measures. Leak management program.**
65. Question Result, ID, References **Sat, GDIM.QA.IMPLEMENTEVDATADIMPIMPL.R, 192.1007(e)**
 Question Text *Based on field observations and/or record reviews, is the data used to measure performance being accurately collected in accordance with the procedures in its DIMP plan?*
 Assets Covered **CNG DIMP 8054**
 Result Notes **Yes. Reviewed Appendix H and K as well as DIMP forms and 293 forms for leaks. CNG has a good leak management program. Leaks are trending downward.**
66. Question Result, ID, References **Sat, GDIM.QA.IMPLEMENTEVBASELINEIMPL.R, 192.1007(e)**
 Question Text *Is each performance measure being monitored from an established baseline?*
 Assets Covered **CNG DIMP 8054**
 Result Notes **All performance measures have an established baseline.**
67. Question Result, ID, References **NA, GDIM.QA.IMPLEMENTEVRISKIMPL.R, 192.1007(e)**
 Question Text *Is each performance measure added since the DIMP plan was last updated tied to a specific risk reduction measure or group of measures?*
 Assets Covered **CNG DIMP 8054**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
68. Question Result, ID, References **Sat, GDIM.CA.PERIODICEVALFREQIMPL.R, 192.1007(f)**
 Question Text *Have periodic evaluations of the DIMP plan been performed on the frequency specified in the plan? [If a periodic evaluation has not been required since plan implementation or the last inspection, mark questions 27-32 as "N/A".]*
 Assets Covered **CNG DIMP 8054**
 Result Notes **All performance measures have an established baseline.**
69. Question Result, ID, References **Sat, GDIM.CA.PERIODICEVALREQTSIMPL.R, 192.1007(f)**

Question Text *Did the periodic evaluation include all required elements?*

Assets Covered CNG DIMP 8054

Result Notes Yes.

70. Question Result, ID, References NA, GDIM.CA.PERIODICEVALHIRISKIMPL.R, 192.1007(f) (192.1007(e))

Question Text *If any established performance measures indicated an increase in risk beyond an acceptable level (as established in the DIMP plan), were new risk reduction measures implemented along with their associated performance measures?*

Assets Covered CNG DIMP 8054

Result Notes No such event occurred, or condition existed, in the scope of inspection review. None since last inspections.

71. Question Result, ID, References NA, GDIM.CA.PERIODICEVALRISKREDIMPL.R, 192.1007(f)

Question Text *If the periodic evaluation indicates that implemented measures to reduce risks are NOT effective, were risk reduction measures modified, deleted or added?*

Assets Covered CNG DIMP 8054

Result Notes No such event occurred, or condition existed, in the scope of inspection review. In 2016 damage prevention was a concern and CNG increased spending on damage prevention to counter the upward trend in damages.

72. Question Result, ID, References NA, GDIM.CA.PERIODICEVALPRFMESIMPL.R, 192.1007(f)

Question Text *Did the periodic evaluation indicate that the selected performance measures are assessing the effectiveness of risk reduction measures, and, if not, were performance measures modified, deleted or added?*

Assets Covered CNG DIMP 8054

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

73. Question Result, ID, References Sat, GDIM.CA.PERIODICEVALDIMPIMPL.R, 192.1007(f)

Question Text *Were procedures followed in conducting periodic evaluations and program improvements?*

Assets Covered CNG DIMP 8054

Result Notes Appendix I Periodic Evaluations

Records show evaluations were completed per the procedure.

74. Question Result, ID, References Sat, GDIM.RR.SUBMITREPORTSIMPL.R, 192.1007(g)

Question Text *Were Parts C and D of the PHMSA Distribution Annual Report (Form 7100.1-1) completed in the submission to PHMSA and the state regulatory authority having jurisdiction, if required, for each year since the last inspection?*

Assets Covered CNG DIMP 8054

Result Notes Yes. Required in Appendix K. Reviewed annual reports for 2016, 2017 and 2018

75. Question Result, ID, References Sat, GDIM.RR.MECHANICALFITTINGDATAIMPL.R, 192.1009 (191.12) (also presented in: PRR.REPORT)

Question Text *Have accurate records been maintained documenting mechanical fitting failures that resulted in hazardous leaks?*

Assets Covered CNG DIMP 8054

Result Notes Stored in Appendix J.

76. Question Result, ID, References Sat, GDIM.RR.MECHANICALFITTINGRPTIMPL.R, 192.1009 (191.12)

Question Text *Did the operator report all mechanical fitting failures that resulted in a hazardous leak for the previous calendar year to PHMSA and State authorities, as appropriate, by March 15th of the next calendar year, and did the reports contain the information required by Department of Transportation Form PHMSA F-7100.1-2?*

Assets Covered CNG DIMP 8054

Result Notes Reviewed 2016, 2017 and 2018 reports.

77. Question Result, ID, References **Sat, GDIM.RR.MECHANICALFITTINGDIMPIMPL.O, 192.1009 (191.12)**
 Question Text *Were procedure(s) followed for collecting the appropriate information and submitting PHMSA Form F-7100.1-2?*
 Assets Covered **CNG DIMP 8054**
78. Question Result, ID, References **Sat, GDIM.QA.RECORDREQUIREMENTSIMPL.R, 192.1011**
 Question Text *Are records retained demonstrating compliance with Subpart P, as specified in its DIMP plan, for 10 years (or since 08/02/2011)?*
 Assets Covered **CNG DIMP 8054**
 Result Notes **Records are kept for 10 years. DIMP model runs are also kept. DIMP plans were reviewed back to 2011.**
79. Question Result, ID, References **Sat, GDIM.QA.RECORDREQTSRETAINIMPL.R, 192.1011**
 Question Text *Were copies of superseded DIMP plans retained for 10 years (or since 08/02/2011)?*
 Assets Covered **CNG DIMP 8054**
 Result Notes **Reviewed on Sharepoint the plan copies from 2011 to current.**
80. Question Result, ID, References **Sat, GDIM.QA.RECORDREQTSDIMPIMPL.R, 192.1011**
 Question Text *Were DIMP procedures followed as applicable to records retention?*
 Assets Covered **CNG DIMP 8054**
 Result Notes **All records reviewed were kept as required.**
81. Question Result, ID, References **NA, GDIM.PI.PERIODICINSPDEVAPPRVIMPL.R, 192.1013(c)**
 Question Text *Has approval been received from PHMSA or the appropriate State Regulatory Authority for alternate (less strict than code) periodic inspection intervals? [If no, mark questions 40-44 "N/A".]*
 Assets Covered **CNG DIMP 8054**
 Result Notes **No such activity/condition was observed during the inspection.**
82. Question Result, ID, References **NA, GDIM.PI.PERIODICINSPDEVPERFRMIMPL.R, 192.1013(c)**
 Question Text *Have the periodic inspections been conducted at the specified alternate intervals?*
 Assets Covered **CNG DIMP 8054**
 Result Notes **No such activity/condition was observed during the inspection.**
83. Question Result, ID, References **NA, GDIM.PI.PERIODICINSPDEVREQTIMPL.R, 192.1013(c)**
 Question Text *Have all conditions been complied with that were required as part of the alternate inspection interval approval?*
 Assets Covered **CNG DIMP 8054**
 Result Notes **No such activity/condition was observed during the inspection.**
84. Question Result, ID, References **NA, GDIM.PI.PERIODICINSPDEVPRFMESIMPL.R, 192.1013(c)**
 Question Text *Do performance measure records indicate that an equal or greater overall level of safety has been achieved since the alternate inspection frequency was implemented?*
 Assets Covered **CNG DIMP 8054**
 Result Notes **No such activity/condition was observed during the inspection.**
85. Question Result, ID, References **NA, GDIM.PI.PERIODICINSPDEVACTIONIMPL.R, 192.1013(c)**
 Question Text *If that an equal or greater overall level of safety has not been achieved, has corrective action been taken?*
 Assets Covered **CNG DIMP 8054**
 Result Notes **No such activity/condition was observed during the inspection.**

Report Parameters: Results: all

Except as required to be disclosed by law, any inspection documentation, including completed protocol forms, summary reports, executive summary reports, and enforcement documentation are for internal use only by federal or state pipeline safety regulators. Some inspection documentation may contain information which the operator considers to be confidential. In addition, supplemental inspection guidance and related documents in the file library are also for internal use only by federal or state pipeline safety regulators (with the exception of documents published in the federal register, such as advisory bulletins). Do not distribute or otherwise disclose such material outside of the state or federal pipeline regulatory organizations. Requests for such information from other government organizations (including, but not limited to, NTSB, GAO, IG, or Congressional Staff) should be referred to PHMSA Headquarters Management.