

# Inspection Output (IOR)

Generated on 2022.October.20 08:04

## Report Filters

Assets All, and including items not linked to any asset.

Results All

## Inspection Information

Inspection Name	NWN Section 114	Operator(s)	NORTHWEST NATURAL GAS CO (13840)	Plan Submitted	--
		Lead	David Cullom	Plan Approval	--
Status	STARTED	Supervisor	Scott Rukke	All Activity Start	09/28/2022
Start Year	2022	Director	Sean Mayo	All Activity End	09/28/2022
System Type	GD			Inspection Submitted	--
Protocol Set ID	WA.GD.2022.01			Inspection Approval	--

## Inspection Summary

### Inspection Scope and Summary

Pursuant to 49 U.S.C. 60108(a)(3), as amended by section 114(a) of the PIPES Act of 2020 (Section 114), PHMSA and state authorities with a certification under 49 U.S.C. 60105 will inspect operators' revised O&M

plans in calendar year 2022. On 10/11/2022, staff from the Washington Utilities and Transportation Commission concluded a review of Northwest Natural's operation and maintenance plan compliance with Section 114

requirements.

### Facilities visited and Total AFOD

(0) facilities visited and there was (1) AFOD

### Summary of Significant Findings

No apparent violations were discovered during this inspection.

### Primary Operator contacts and/or participants

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Lisa Sherer Regulatory Contact Code Compliance Specialist lisa.sherer@nwnatural.com (503) 610-7281 (503) 522-9219

### Operator executive contact and mailing address for any official correspondence

Jon G. Huddleston

Vice President of Engineering and Utility Operations

Northwest Natural

250 Southwest Taylor Street

## Scope (Assets)

#	Short Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1.	88965 (1,826)	Northwest Natural-HEADQUARTERS	unit	88965	--	20	20	20	20	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.	88965 (1,826)	--	114	P, R, O, S	Detail	--

## Plan Implementations

#	Activity Name	SMAR T Act#	Start Date	End Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Inspected	Total	Required % Complete
1	NWN Section 114	--	09/28/2022	--	--	all planned questions	all assets	all types	20	20	20	20	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

This inspection has no Form data entry.

## Results (all values, 20 results)

40 (instead of 20) results are listed due to re-presentation of questions in more than one sub-group.

### 114.GD: Section 114 - Gas Distribution

1. Question Result, ID, References **NIC, SRN.114.INSPECTCVRG.S**, (also presented in: 114.MM)  
 Question Text *What are your assets comprised of?*  
 Assets Covered **88965 (1,826)**  
 Result Notes **In Washington, there are 1993.4 miles of main and 86,844 services. 46% is cathodically protected steel and the other 54% is MDPE pipe .**
2. Question Result, ID, References **NIC, SRN.114.GASTRANSPORT.S**, (also presented in: 114.MM)  
 Question Text *Do you transport natural gas as a specific commodity (i.e., not a byproduct or constituent of another substance)?*  
 Assets Covered **88965 (1,826)**

Result Notes It is transported as a specific commodity. There is only the Camas (P04) line in Washington for transmission systems and the rest of Northwest Natural's system is distribution in Washington State.

3. Question Result, ID, References NA, SRN.114.DRIVERENGINE.S, (also presented in: 114.MM)

Question Text Do you use natural gas-fueled drivers or engines to compress natural gas?

Assets Covered 88965 (1,826)

Result Notes The operator does not have any compressors in Washington.

4. Question Result, ID, References NIC, SRN.114.NGUSE.S, (also presented in: 114.MM)

Question Text Do you use natural gas for fuel or power appurtenances or instrument gas on regulated facilities?

Assets Covered 88965 (1,826)

Result Notes Natural gas drives some of the YZ odorizers. They are the injector style odorizers.

5. Question Result, ID, References Sat, 114.114.LKRLSID.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)

Question Text Do procedures provide a methodology for identifying sources of fugitive natural gas emissions in the system?

Assets Covered 88965 (1,826)

Result Notes Leak surveys are completed. Leak classifications are made. This is in the FOM and the SP. The leak survey is procedure is SP 707 and SP 709 is the leak classification.

6. Question Result, ID, References Sat, 114.114.LKRLSVENT.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)

Question Text Do procedures identify measures for minimizing natural gas release volumes associated with non-emergency venting and blowdowns from operations and maintenance?

Assets Covered 88965 (1,826)

Result Notes They have engineering procedures that address this:

J12 is a methane mitigation procedure

J11 is the blowdown flare procedure

J16 is the gas flaring procedure

J17 is blowdown compression

7. Question Result, ID, References Sat, 114.114.LKRLSUNEXPCTVENT.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)

Question Text Do procedures provide for investigation of any unanticipated vented releases of natural gas, and if so, what are the associated actions?

Assets Covered 88965 (1,826)

Result Notes This is in the online Field Operations Manual (FOM). (Responding to venting reliefs) There are guidelines for investigation samples and leak locations include: Man holes, catch basins, attic vents. Investigating leaks and odors was also reviewed.

8. Question Result, ID, References Sat, 114.114.LKRLSLKDATA.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)

Question Text Do procedures include a methodology to collect, retain and analyze detailed information from detected natural gas leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?

Assets Covered 88965 (1,826)

Result Notes NWNs Standard Procedure - SP 709 discusses leak repair and classification.

9. Question Result, ID, References Sat, 114.114.LKRLSDETECTLK.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)

Question Text Do procedures include instructions for personnel to detect leaks to help further reduce emission in stations and along the right of way?

Assets Covered 88965 (1,826)

Result Notes Patrols and surveys are done at stations. Leak investigations is in 501.02 and the OQ 500-01 is conducting a leakage survey.

10. Question Result, ID, References **Sat, 114.114.LKRLSIDMITRPR.P, 49 U.S.C. 60108(a)** (also presented in: 114.MM)  
 Question Text *Do procedures define a process to identify, classify, mitigate and repair leaks?*  
 Assets Covered **88965 (1,826)**  
 Result Notes **Leak classification is in SP 709. The underground leak classification guide is in the FOM.**
11. Question Result, ID, References **Sat, 114.114.LKMITRPLAUF.P, 49 U.S.C. 60108(a)** (also presented in: 114.MM)  
 Question Text *Do procedures provide for review of Lost & Unaccounted for Gas (LAUF) and do procedures specify actions to reduce the associated volume?*  
 Assets Covered **88965 (1,826)**  
 Result Notes **This is in subpart W. Gas loss on damages is in 1315. Washington Dept of Ecology reporting has been performed for the past several years.**
12. Question Result, ID, References **Sat, 114.114.REGSTATIONOM.P, 49 U.S.C. 60108(a)** (also presented in: 114.MM)  
 Question Text *Do maintenance or operational procedures contain measures for reduction of natural gas releases from regulators?*  
 Assets Covered **88965 (1,826)**  
 Result Notes **The FOM contains regulator maintenance procedures. (Maintaining large meters and regulator stations)**
13. Question Result, ID, References **Sat, 114.114.REGSTATIONCONFIG.P, 49 U.S.C. 60108(a)** (also presented in: 114.MM)  
 Question Text *Do maintenance or operational procedures contain measures for identifying potential configuration changes that would reduce natural gas releases from regulators?*  
 Assets Covered **88965 (1,826)**  
 Result Notes **Some token reliefs in Washington. No rupture discs in Washington State.**  
  
**They have engineering procedures that address this:**  
  
**J12 is a methane mitigation procedure**
14. Question Result, ID, References **Sat, 114.114.TESTRELIEFVLV.P, 49 U.S.C. 60108(a)** (also presented in: 114.MM)  
 Question Text *Do relief valve testing procedures include measures to minimize natural gas releases?*  
 Assets Covered **88965 (1,826)**  
 Result Notes **The FOM (Inspecting and testing relief valves) has that guidance in order to minimize the release of large volumes of gas.**
15. Question Result, ID, References **Sat, 114.114.FLARE.P, 49 U.S.C. 60108(a)** (also presented in: 114.MM)  
 Question Text *Do procedures for flaring from pipeline facilities for transporting natural gas include measures for minimization of natural gas emissions?*  
 Assets Covered **88965 (1,826)**  
 Result Notes **The operator utilizes a 30' and a 10' Stack Flare blowdown trailer. This is when other options are not available. This is detailed in engineering procedure J-12.**
16. Question Result, ID, References **Sat, 114.114.GNLDSGNCNFG.P, 49 U.S.C. 60108(a)** (also presented in: 114.MM)  
 Question Text *Do operation and maintenance procedures contain mechanisms for identifying potential design/configuration changes for reducing natural gas releases?*  
 Assets Covered **88965 (1,826)**  
 Result Notes **Procedure L-5 Rev. 12/29/17. Leakage repair contains these procedures.**
17. Question Result, ID, References **Sat, 114.LEAKPRONE.LKRLS.P, 49 U.S.C. 60108(a)** (also presented in: 114.MM)  
 Question Text *What procedures are in place to monitor for and identify pipe segments that are leak-prone, and what criteria (e.g., frequency of leak or failure events) are specified for determining a pipeline segment is leak-prone?*  
 Assets Covered **88965 (1,826)**  
 Result Notes **NWN does not have leak prone pipe. The DIMP program in Appendix E-4 contains this information. They use coated, cathodically protected steel or PE.**

18. Question Result, ID, References **Sat, 114.LEAKPRONE.LKRLSLKDATA.P, 49 U.S.C. 60108(a)** (also presented in: 114.MM)  
 Question Text *Do procedures include a methodology to collect, retain and analyze detailed information from detected leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?*  
 Assets Covered **88965 (1,826)**  
 Result Notes **This is located in Appendix E-4 of the DIMP program.**
19. Question Result, ID, References **Sat, 114.LEAKPRONE.LKMITGRPREXAMPLE.P, 49 U.S.C. 60108(a)** (also presented in: 114.MM)  
 Question Text *Do procedures identify cast iron, unprotected steel, wrought iron, and vintage plastic pipe with known leak issues?*  
 Assets Covered **88965 (1,826)**  
 Result Notes **There are "Additional and Accelerated Actions" in the DIMP to replace ABS and bare steel.**
20. Question Result, ID, References **Sat, 114.LEAKPRONE.LKMITGRPROTHER.P, 49 U.S.C. 60108(a)** (also presented in: 114.MM)  
 Question Text *Do procedures clearly define a process to address replacement or remediation of pipe segments with known leak issues beyond those specifically identified in Section 114?*  
 Assets Covered **88965 (1,826)**  
 Result Notes **Plexco Celcon caps are replaced as needed. This is also in DIMP and the PRP.**

## 114.MM: Section 114 - Master Meter

21. Question Result, ID, References **NIC, SRN.114.INSPECTCVRG.S,** (also presented in: 114.GD)  
 Question Text *What are your assets comprised of?*  
 Assets Covered **88965 (1,826)**  
 Result Notes **In Washington, there are 1993.4 miles of main and 86,844 services. 46% is cathodically protected steel and the other 54% is MDPE pipe .**
22. Question Result, ID, References **NIC, SRN.114.GASTRANSPORT.S,** (also presented in: 114.GD)  
 Question Text *Do you transport natural gas as a specific commodity (i.e., not a byproduct or constituent of another substance)?*  
 Assets Covered **88965 (1,826)**  
 Result Notes **It is transported as a specific commodity. There is only the Camas (P04) line in Washington for transmission systems and the rest of Northwest Natural's system is distribution in Washington State.**
23. Question Result, ID, References **NA, SRN.114.DRIVERENGINE.S,** (also presented in: 114.GD)  
 Question Text *Do you use natural gas-fueled drivers or engines to compress natural gas?*  
 Assets Covered **88965 (1,826)**  
 Result Notes **The operator does not have any compressors in Washington.**
24. Question Result, ID, References **NIC, SRN.114.NGUSE.S,** (also presented in: 114.GD)  
 Question Text *Do you use natural gas for fuel or power appurtenances or instrument gas on regulated facilities?*  
 Assets Covered **88965 (1,826)**  
 Result Notes **Natural gas drives some of the YZ odorizers. They are the injector style odorizers.**
25. Question Result, ID, References **Sat, 114.114.LKRLSID.P, 49 U.S.C. 60108(a)** (also presented in: 114.GD)  
 Question Text *Do procedures provide a methodology for identifying sources of fugitive natural gas emissions in the system?*  
 Assets Covered **88965 (1,826)**  
 Result Notes **Leak surveys are completed. Leak classifications are made. This is in the FOM and the SP. The leak survey is procedure is SP 707 and SP 709 is the leak classification.**
26. Question Result, ID, References **Sat, 114.114.LKRLSVENT.P, 49 U.S.C. 60108(a)** (also presented in: 114.GD)

Question Text *Do procedures identify measures for minimizing natural gas release volumes associated with non-emergency venting and blowdowns from operations and maintenance?*

Assets Covered 88965 (1,826)

Result Notes They have engineering procedures that address this:

J12 is a methane mitigation procedure

J11 is the blowdown flare procedure

J16 is the gas flaring procedure

J17 is blowdown compression

27. Question Result, ID, References Sat, 114.114.LKRLSUNEXPCTVENT.P, 49 U.S.C. 60108(a) (also presented in: 114.GD)

Question Text *Do procedures provide for investigation of any unanticipated vented releases of natural gas, and if so, what are the associated actions?*

Assets Covered 88965 (1,826)

Result Notes This is in the online Field Operations Manual (FOM). (Responding to venting reliefs) There are guidelines for investigation samples and leak locations include: Man holes, catch basins, attic vents. Investigating leaks and odors was also reviewed.

28. Question Result, ID, References Sat, 114.114.LKRLSLKDATA.P, 49 U.S.C. 60108(a) (also presented in: 114.GD)

Question Text *Do procedures include a methodology to collect, retain and analyze detailed information from detected natural gas leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?*

Assets Covered 88965 (1,826)

Result Notes NWNs Standard Procedure - SP 709 discusses leak repair and classification.

29. Question Result, ID, References Sat, 114.114.LKRLSDETECTLK.P, 49 U.S.C. 60108(a) (also presented in: 114.GD)

Question Text *Do procedures include instructions for personnel to detect leaks to help further reduce emission in stations and along the right of way?*

Assets Covered 88965 (1,826)

Result Notes Patrols and surveys are done at stations. Leak investigations is in 501.02 and the OQ 500-01 is conducting a leakage survey.

30. Question Result, ID, References Sat, 114.114.LKRLSIDMITRPR.P, 49 U.S.C. 60108(a) (also presented in: 114.GD)

Question Text *Do procedures define a process to identify, classify, mitigate and repair leaks?*

Assets Covered 88965 (1,826)

Result Notes Leak classification is in SP 709. The underground leak classification guide is in the FOM.

31. Question Result, ID, References Sat, 114.114.LKMITRPRLAUF.P, 49 U.S.C. 60108(a) (also presented in: 114.GD)

Question Text *Do procedures provide for review of Lost & Unaccounted for Gas (LAUF) and do procedures specify actions to reduce the associated volume?*

Assets Covered 88965 (1,826)

Result Notes This is in subpart W. Gas loss on damages is in 1315. Washington Dept of Ecology reporting has been performed for the past several years.

32. Question Result, ID, References Sat, 114.114.REGSTATIONOM.P, 49 U.S.C. 60108(a) (also presented in: 114.GD)

Question Text *Do maintenance or operational procedures contain measures for reduction of natural gas releases from regulators?*

Assets Covered 88965 (1,826)

Result Notes The FOM contains regulator maintenance procedures. (Maintaining large meters and regulator stations)

33. Question Result, ID, References Sat, 114.114.REGSTATIONCONFIG.P, 49 U.S.C. 60108(a) (also presented in: 114.GD)

Question Text *Do maintenance or operational procedures contain measures for identifying potential configuration changes that would reduce natural gas releases from regulators?*

Assets Covered 88965 (1,826)

Result Notes Some token reliefs in Washington. No rupture discs in Washington State.

They have engineering procedures that address this:

J12 is a methane mitigation procedure

34. Question Result, ID, References Sat, 114.114.TESTRELIEFVLV.P, 49 U.S.C. 60108(a) (also presented in: 114.GD)

Question Text *Do relief valve testing procedures include measures to minimize natural gas releases?*

Assets Covered 88965 (1,826)

Result Notes The FOM (Inspecting and testing relief valves) has that guidance in order to minimize the release of large volumes of gas.

35. Question Result, ID, References Sat, 114.114.FLARE.P, 49 U.S.C. 60108(a) (also presented in: 114.GD)

Question Text *Do procedures for flaring from pipeline facilities for transporting natural gas include measures for minimization of natural gas emissions?*

Assets Covered 88965 (1,826)

Result Notes The operator utilizes a 30' and a 10' Stack Flare blowdown trailer. This is when other options are not available. This is detailed in engineering procedure J-12.

36. Question Result, ID, References Sat, 114.114.GNLDSGNCNFG.P, 49 U.S.C. 60108(a) (also presented in: 114.GD)

Question Text *Do operation and maintenance procedures contain mechanisms for identifying potential design/configuration changes for reducing natural gas releases?*

Assets Covered 88965 (1,826)

Result Notes Procedure L-5 Rev. 12/29/17. Leakage repair contains these procedures.

37. Question Result, ID, References Sat, 114.LEAKPRONE.LKRLS.P, 49 U.S.C. 60108(a) (also presented in: 114.GD)

Question Text *What procedures are in place to monitor for and identify pipe segments that are leak-prone, and what criteria (e.g., frequency of leak or failure events) are specified for determining a pipeline segment is leak-prone?*

Assets Covered 88965 (1,826)

Result Notes NWN does not have leak prone pipe. The DIMP program in Appendix E-4 contains this information. They use coated, cathodically protected steel or PE.

38. Question Result, ID, References Sat, 114.LEAKPRONE.LKRLSLKDATA.P, 49 U.S.C. 60108(a) (also presented in: 114.GD)

Question Text *Do procedures include a methodology to collect, retain and analyze detailed information from detected leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?*

Assets Covered 88965 (1,826)

Result Notes This is located in Appendix E-4 of the DIMP program.

39. Question Result, ID, References Sat, 114.LEAKPRONE.LKMITGRPREXAMPLE.P, 49 U.S.C. 60108(a) (also presented in: 114.GD)

Question Text *Do procedures identify cast iron, unprotected steel, wrought iron, and vintage plastic pipe with known leak issues?*

Assets Covered 88965 (1,826)

Result Notes There are "Additional and Accelerated Actions" in the DIMP to replace ABS and bare steel.

40. Question Result, ID, References Sat, 114.LEAKPRONE.LKMITGRPROTHER.P, 49 U.S.C. 60108(a) (also presented in: 114.GD)

Question Text *Do procedures clearly define a process to address replacement or remediation of pipe segments with known leak issues beyond those specifically identified in Section 114?*

Assets Covered 88965 (1,826)

Result Notes Plexco Celcon caps are replaced as needed. This is also in DIMP and the PRP.

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.



# Inspection Results (IRR)

Generated on 2022.October.20 07:46

• 88965 (1,826) (40)

## Inspection Results Report (ALL Results) - Scp\_PK 88965 (1,826)

Row	Assets	Result (Note <sup>1</sup> )	Sub-Group	Qst #	Question ID	References	Question Text
1.	88965 (1,826)	NIC	2	114.GD	1. SRN.114.INSPECTCVRG.S		What are your assets comprised of?
2.	88965 (1,826)	NIC	2	114.GD	2. SRN.114.GASTRANSPORT.S		Do you transport natural gas as a specific commodity (i.e., not a byproduct or constituent of another substance)?
3.	88965 (1,826)	NA	2	114.GD	3. SRN.114.DRIVERENGINE.S		Do you use natural gas-fueled drivers or engines to compress natural gas?
4.	88965 (1,826)	NIC	2	114.GD	4. SRN.114.NGUSE.S		Do you use natural gas for fuel or power appurtenances or instrument gas on regulated facilities?
5.	88965 (1,826)	Sat	2	114.GD	5. 114.114.LKRLSID.P	49 U.S.C. 60108(a)	Do procedures provide a methodology for identifying sources of fugitive natural gas emissions in the system?
6.	88965 (1,826)	Sat	2	114.GD	6. 114.114.LKRLSVENT.P	49 U.S.C. 60108(a)	Do procedures identify measures for minimizing natural gas release volumes associated with non-emergency venting and blowdowns from operations and maintenance?
7.	88965 (1,826)	Sat	2	114.GD	7. 114.114.LKRLSUNEXPTVENT.P	49 U.S.C. 60108(a)	Do procedures provide for investigation of any unanticipated vented releases of natural gas, and if so, what are the associated actions?
8.	88965 (1,826)	Sat	2	114.GD	8. 114.114.LKRLSLKDATA.P	49 U.S.C. 60108(a)	Do procedures include a methodology to collect, retain and analyze detailed information from detected natural gas leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?
9.	88965 (1,826)	Sat	2	114.GD	9. 114.114.LKRLSDETECTLK.P	49 U.S.C. 60108(a)	Do procedures include instructions for personnel to detect leaks to help further reduce emission in stations and along the right of way?
10.	88965 (1,826)	Sat	2	114.GD	10. 114.114.LKRLSIDMITRPR.P	49 U.S.C. 60108(a)	Do procedures define a process to identify, classify, mitigate and repair leaks?

## Inspection Results Report (ALL Results) - Scp\_PK 88965 (1,826)

Row	Assets	Result (Note <sup>1</sup> )	Sub-Group	Qst #	Question ID	References	Question Text
11.	88965 (1,826)	Sat	2	114.GD	11. 114.114.LKMITRPRLAUF.P	49 U.S.C. 60108(a)	Do procedures provide for review of Lost & Unaccounted for Gas (LAUF) and do procedures specify actions to reduce the associated volume?
12.	88965 (1,826)	Sat	2	114.GD	12. 114.114.REGSTATIONOM.P	49 U.S.C. 60108(a)	Do maintenance or operational procedures contain measures for reduction of natural gas releases from regulators?
13.	88965 (1,826)	Sat	2	114.GD	13. 114.114.REGSTATIONCONFIG.P	49 U.S.C. 60108(a)	Do maintenance or operational procedures contain measures for identifying potential configuration changes that would reduce natural gas releases from regulators?
14.	88965 (1,826)	Sat	2	114.GD	14. 114.114.TESTRELIEFVLV.P	49 U.S.C. 60108(a)	Do relief valve testing procedures include measures to minimize natural gas releases?
15.	88965 (1,826)	Sat	2	114.GD	15. 114.114.FLARE.P	49 U.S.C. 60108(a)	Do procedures for flaring from pipeline facilities for transporting natural gas include measures for minimization of natural gas emissions?
16.	88965 (1,826)	Sat	2	114.GD	16. 114.114.GNLDSGNCNCFG.P	49 U.S.C. 60108(a)	Do operation and maintenance procedures contain mechanisms for identifying potential design/configuration changes for reducing natural gas releases?
17.	88965 (1,826)	Sat	2	114.GD	17. 114.LEAKPRONE.LKRLS.P	49 U.S.C. 60108(a)	What procedures are in place to monitor for and identify pipe segments that are leak-prone, and what criteria (e.g., frequency of leak or failure events) are specified for determining a pipeline segment is leak-prone?
18.	88965 (1,826)	Sat	2	114.GD	18. 114.LEAKPRONE.LKRLSLKDATA.P	49 U.S.C. 60108(a)	Do procedures include a methodology to collect, retain and analyze detailed information from detected leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?
19.	88965 (1,826)	Sat	2	114.GD	19. 114.LEAKPRONE.LKMITGRPREXAMPLE.P	49 U.S.C. 60108(a)	Do procedures identify cast iron, unprotected steel, wrought iron, and vintage plastic pipe with known leak issues?
20.	88965 (1,826)	Sat	2	114.GD	20. 114.LEAKPRONE.LKMITGRPROTHER.P	49 U.S.C. 60108(a)	Do procedures clearly define a process to address replacement or remediation of pipe segments with known leak issues beyond

## Inspection Results Report (ALL Results) - Scp\_PK 88965 (1,826)

Row	Assets	Result (Note <sup>1</sup> )	Sub-Group	Qst #	Question ID	References	Question Text
							those specifically identified in Section 114?
21.	88965 (1,826)	NIC	2	114.MM	1. SRN.114.INSPECTCVRG.S		What are your assets comprised of?
22.	88965 (1,826)	NIC	2	114.MM	2. SRN.114.GASTRANSPORT.S		Do you transport natural gas as a specific commodity (i.e., not a byproduct or constituent of another substance)?
23.	88965 (1,826)	NA	2	114.MM	3. SRN.114.DRIVERENGINE.S		Do you use natural gas-fueled drivers or engines to compress natural gas?
24.	88965 (1,826)	NIC	2	114.MM	4. SRN.114.NGUSE.S		Do you use natural gas for fuel or power appurtenances or instrument gas on regulated facilities?
25.	88965 (1,826)	Sat	2	114.MM	5. 114.114.LKRLSID.P	49 U.S.C. 60108(a)	Do procedures provide a methodology for identifying sources of fugitive natural gas emissions in the system?
26.	88965 (1,826)	Sat	2	114.MM	6. 114.114.LKRLSVENT.P	49 U.S.C. 60108(a)	Do procedures identify measures for minimizing natural gas release volumes associated with non-emergency venting and blowdowns from operations and maintenance?
27.	88965 (1,826)	Sat	2	114.MM	7. 114.114.LKRLSUNEXPCTVENT.P	49 U.S.C. 60108(a)	Do procedures provide for investigation of any unanticipated vented releases of natural gas, and if so, what are the associated actions?
28.	88965 (1,826)	Sat	2	114.MM	8. 114.114.LKRLSLKDATA.P	49 U.S.C. 60108(a)	Do procedures include a methodology to collect, retain and analyze detailed information from detected natural gas leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?
29.	88965 (1,826)	Sat	2	114.MM	9. 114.114.LKRLSDETECTLK.P	49 U.S.C. 60108(a)	Do procedures include instructions for personnel to detect leaks to help further reduce emission in stations and along the right of way?
30.	88965 (1,826)	Sat	2	114.MM	10. 114.114.LKRLSIDMITRPR.P	49 U.S.C. 60108(a)	Do procedures define a process to identify, classify, mitigate and repair leaks?
31.	88965 (1,826)	Sat	2	114.MM	11. 114.114.LKMITRPRLAUF.P	49 U.S.C. 60108(a)	Do procedures provide for review of Lost & Unaccounted for Gas (LAUF) and do procedures specify actions to reduce the associated volume?
32.	88965 (1,826)	Sat	2	114.MM	12. 114.114.REGSTATIONOM.P	49 U.S.C. 60108(a)	Do maintenance or operational procedures

## Inspection Results Report (ALL Results) - Scp\_PK 88965 (1,826)

Row	Assets	Result (Note <sup>1</sup> )	Sub-Group	Qst #	Question ID	References	Question Text
							contain measures for reduction of natural gas releases from regulators?
33.	88965 (1,826)	Sat	2	114.MM	13. 114.114.REGSTATIONCONFIG.P	49 U.S.C. 60108(a)	Do maintenance or operational procedures contain measures for identifying potential configuration changes that would reduce natural gas releases from regulators?
34.	88965 (1,826)	Sat	2	114.MM	14. 114.114.TESTRELIEFVLV.P	49 U.S.C. 60108(a)	Do relief valve testing procedures include measures to minimize natural gas releases?
35.	88965 (1,826)	Sat	2	114.MM	15. 114.114.FLARE.P	49 U.S.C. 60108(a)	Do procedures for flaring from pipeline facilities for transporting natural gas include measures for minimization of natural gas emissions?
36.	88965 (1,826)	Sat	2	114.MM	16. 114.114.GNLDSGNCNCFG.P	49 U.S.C. 60108(a)	Do operation and maintenance procedures contain mechanisms for identifying potential design/configuration changes for reducing natural gas releases?
37.	88965 (1,826)	Sat	2	114.MM	17. 114.LEAKPRONE.LKRLS.P	49 U.S.C. 60108(a)	What procedures are in place to monitor for and identify pipe segments that are leak-prone, and what criteria (e.g., frequency of leak or failure events) are specified for determining a pipeline segment is leak-prone?
38.	88965 (1,826)	Sat	2	114.MM	18. 114.LEAKPRONE.LKRLSLKDATA.P	49 U.S.C. 60108(a)	Do procedures include a methodology to collect, retain and analyze detailed information from detected leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?
39.	88965 (1,826)	Sat	2	114.MM	19. 114.LEAKPRONE.LKMITGRPREXAMPLE.P	49 U.S.C. 60108(a)	Do procedures identify cast iron, unprotected steel, wrought iron, and vintage plastic pipe with known leak issues?
40.	88965 (1,826)	Sat	2	114.MM	20. 114.LEAKPRONE.LKMITGRPROTHER.P	49 U.S.C. 60108(a)	Do procedures clearly define a process to address replacement or remediation of pipe segments with known leak issues beyond those specifically identified in Section 114?

1. Result is repeated (N) times in this report due to re-presentation of the question in multiple sub-groups.

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.