

# Inspection Output (IOR)

Generated on 2022.November.08 08:28

## Report Filters

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

Results **All**

## Inspection Information

Inspection Name	J.R. Simplot Section 114 #8525	Operator(s)	J.R. SIMPLOT COMPANY (32395) Lead Darren Tinnerstet	Plan Submitted	11/08/2022
Status	STARTED	Supervisor	Scott Rukke	Plan Approval	--
Start Year	2022	Director	Sean Mayo	All Activity Start	11/08/2022
System Type	GT			All Activity End	11/08/2022
Protocol Set ID	GT.2022.02			Inspection Submitted	--
				Inspection Approval	--

## Inspection Summary

### Inspection Scope and Summary

Section 114 emissions procedure review conducted remotely via Microsoft Teams on 11/8/2022.

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.

### Facilities visited and Total AFOD

No facilities visited. Section 114 review was conducted remotely via Microsoft Teams.

### Summary of Significant Findings

*(DO NOT Discuss Enforcement options)*

No significant findings.

### Primary Operator contacts and/or participants

Andrew Erickson - Environmental Manager

Doug Erickson (EverLine) - Consultant

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

Mike Davis

Unit Director

J.R. Simplot Company

1099 West Front Street

Boise, ID 83702

## Scope (Assets)

#	Short Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	86257	JR Simplot	unit	86257	--	24	24	24	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.	86257	--	114	P, R, O, S	Detail	--

## Plan Implementations

#	Activity Name	SMAR T Act#	Start Date	End Date	Focus Directive s	Involved Groups/Subgroups	Asset s	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete
1	J.R. Simplot Section 114	--	11/08/2022	11/08/2022	--	all planned questions	all assets	all types	24	24	24	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	J.R. Simplot Section 114	COMPLETED	11/08/2022	J.R. Simplot Section 114	--

## Results (all values, 24 results)

58 (instead of 24) results are listed due to re-presentation of questions in more than one sub-group.

### 114.GT: Section 114 - Gas Transmission

1. Question Result, ID, References **NIC, SRN.114.INSPECTCVRG.S**, (also presented in: 114.UNGS, 114.GGBOOST)

Question Text *What are your assets comprised of?*

Assets Covered **86257**

Result Notes **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.**

2. Question Result, ID, References **NIC, SRN.114.GASTRANSPORT.S**, (also presented in: 114.UNGS, 114.GGBOOST)

Question Text *Do you transport natural gas as a specific commodity (i.e., not a byproduct or constituent of another substance)?*

Assets Covered **86257**

Result Notes **Gas transportation is bio gas only.**

3. Question Result, ID, References **NA, SRN.114.DRIVERENGINE.S**, (also presented in: 114.UNGS, 114.GGBOOST)  
 Question Text *Do you use natural gas-fueled drivers or engines to compress natural gas?*  
 Assets Covered **86257**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
4. Question Result, ID, References **NA, SRN.114.NGUSE.S**, (also presented in: 114.UNGS, 114.GGBOOST)  
 Question Text *Do you use natural gas for fuel or power appurtenances or instrument gas on regulated facilities?*  
 Assets Covered **86257**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
5. Question Result, ID, References **NA, 114.114.COMPRESSOR.P, 49 U.S.C. 60108(a)** (also presented in: 114.UNGS, 114.GGBOOST)  
 Question Text *Do the maintenance and operations procedures for compressors include provisions to minimize fugitive natural gas losses?*  
 Assets Covered **86257**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
6. Question Result, ID, References **NA, 114.114.DRIVERENGINE.P, 49 U.S.C. 60108(a)** (also presented in: 114.UNGS, 114.GGBOOST)  
 Question Text *Do maintenance procedures include measures for monitoring and correcting incomplete combustion of natural gas in driver or engine exhausts and taking corrective action if identified?*  
 Assets Covered **86257**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
7. Question Result, ID, References **Sat, 114.114.LKRLSID.P, 49 U.S.C. 60108(a)** (also presented in: 114.GGBOOST)  
 Question Text *Do procedures provide a methodology for identifying sources of fugitive natural gas emissions in the system?*  
 Assets Covered **86257**  
 Result Notes **OM Manual Section 7.14 - Emissions Prevention.**
8. Question Result, ID, References **Sat, 114.114.LKRLSVENT.P, 49 U.S.C. 60108(a)** (also presented in: 114.UNGS, 114.GGBOOST)  
 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 **86257**  
 Result Notes **OM Manual Section 7.14 - Emissions Prevention.**
9. Question Result, ID, References **Sat, 114.114.LKRLSUNEXPCTVENT.P, 49 U.S.C. 60108(a)** (also presented in: 114.UNGS, 114.GGBOOST)  
 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 **86257**  
 Result Notes **OM Manual Section 7.14 - Emissions Prevention.**
10. Question Result, ID, References **Sat, 114.114.LKRLSLKDATA.P, 49 U.S.C. 60108(a)** (also presented in: 114.UNGS, 114.GGBOOST)  
 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 **86257**  
 Result Notes **OM Manual Section 7.14 - Emissions Prevention.**
11. Question Result, ID, References **Sat, 114.114.LKRLSDETECTLK.P, 49 U.S.C. 60108(a)**  
 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 **86257**  
 Result Notes **OM Manual Section 7.14 - Emissions Prevention.**

12. Question Result, ID, References **Sat, 114.114.LKMITGRPRREPAIR.P, 49 U.S.C. 60108(a)**  
Question Text *Do procedures provide alternatives to cutouts (to reduce emissions)?*  
Assets Covered **86257**  
Result Notes **OM Manual Section 15 - Permanent Repairs of leaks.**
13. Question Result, ID, References **Sat, 114.114.TESTESD.P, 49 U.S.C. 60108(a)** (also presented in: 114.GGBOOST)  
Question Text *Do procedures contain measures for ensuring ESD testing minimizes natural gas releases?*  
Assets Covered **86257**  
Result Notes **OM Manual Section 3.3 - Shutdown Procedures.**
14. Question Result, ID, References **Sat, 114.114.TESTRELIEFVLV.P, 49 U.S.C. 60108(a)** (also presented in: 114.UNGS, 114.GGBOOST)  
Question Text *Do relief valve testing procedures include measures to minimize natural gas releases?*  
Assets Covered **86257**  
Result Notes **OM Manual Section 7.14 - Emissions Prevention.**
15. Question Result, ID, References **NA, 114.114.FLARE.P, 49 U.S.C. 60108(a)** (also presented in: 114.GGBOOST)  
Question Text *Do procedures for flaring from pipeline facilities for transporting natural gas include measures for minimization of natural gas emissions?*  
Assets Covered **86257**  
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
16. Question Result, ID, References **Sat, 114.114.GNLDSGNCNFG.P, 49 U.S.C. 60108(a)** (also presented in: 114.UNGS, 114.GGBOOST)  
Question Text *Do operation and maintenance procedures contain mechanisms for identifying potential design/configuration changes for reducing natural gas releases?*  
Assets Covered **86257**  
Result Notes **OM Manual Section 7.14 - Emissions Prevention.**
17. Question Result, ID, References **NA, 114.114.GNLCMPSTATION.P, 49 U.S.C. 60108(a)** (also presented in: 114.GGBOOST)  
Question Text *Do procedures contain mechanisms for minimizing natural gas emissions from operations and maintenance activities within a compressor station (i.e., beyond compressor/driver-specific procedures)?*  
Assets Covered **86257**  
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
18. Question Result, ID, References **Sat, 114.LEAKPRONE.LKRLS.P, 49 U.S.C. 60108(a)** (also presented in: 114.UNGS, 114.GGBOOST)  
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 **86257**  
Result Notes **OM Manual Section 7.14 - Emissions Prevention.**
19. Question Result, ID, References **Sat, 114.LEAKPRONE.LKRLSLKDATA.P, 49 U.S.C. 60108(a)** (also presented in: 114.UNGS, 114.GGBOOST)  
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 **86257**  
Result Notes **OM Manual Section 7.14 - Emissions Prevention.**
20. Question Result, ID, References **Sat, 114.LEAKPRONE.LKMITGRPEXAMPLE.P, 49 U.S.C. 60108(a)** (also presented in: 114.UNGS, 114.GGBOOST)  
Question Text *Do procedures identify cast iron, unprotected steel, wrought iron, and vintage plastic pipe with known leak issues?*  
Assets Covered **86257**  
Result Notes **OM Manual Section 7.14 - Emissions Prevention.**
21. Question Result, ID, References **NA, 114.LEAKPRONE.LKMITGRPROTHER.P, 49 U.S.C. 60108(a)** (also presented in: 114.UNGS, 114.GGBOOST)

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 86257

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

## 114.UNGS: Section 114 - Underground Natural Gas Storage

22. Question Result, ID, References NIC, SRN.114.INSPECTCVRG.S, (also presented in: 114.GT, 114.GGBOOST)

Question Text *What are your assets comprised of?*

Assets Covered 86257

Result Notes 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.

23. Question Result, ID, References NIC, SRN.114.GASTRANSPORT.S, (also presented in: 114.GT, 114.GGBOOST)

Question Text *Do you transport natural gas as a specific commodity (i.e., not a byproduct or constituent of another substance)?*

Assets Covered 86257

Result Notes Gas transportation is bio gas only.

24. Question Result, ID, References NA, SRN.114.DRIVERENGINE.S, (also presented in: 114.GT, 114.GGBOOST)

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

Assets Covered 86257

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

25. Question Result, ID, References NA, SRN.114.NGUSE.S, (also presented in: 114.GT, 114.GGBOOST)

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

Assets Covered 86257

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

26. Question Result, ID, References NA, 114.114.COMPRESSOR.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.GGBOOST)

Question Text *Do the maintenance and operations procedures for compressors include provisions to minimize fugitive natural gas losses?*

Assets Covered 86257

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

27. Question Result, ID, References NA, 114.114.DRIVERENGINE.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.GGBOOST)

Question Text *Do maintenance procedures include measures for monitoring and correcting incomplete combustion of natural gas in driver or engine exhausts and taking corrective action if identified?*

Assets Covered 86257

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

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

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 86257

Result Notes OM Manual Section 7.14 - Emissions Prevention.

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

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 86257

Result Notes OM Manual Section 7.14 - Emissions Prevention.

30. Question Result, ID, References **Sat, 114.114.LKRLSLKDATA.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT, 114.GGBOOST)  
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 **86257**  
Result Notes **OM Manual Section 7.14 - Emissions Prevention.**
31. Question Result, ID, References **NA, 114.114.LKRLSWELLHD.P, 49 U.S.C. 60108(a)**  
Question Text *Do procedures provide for periodic leakage surveys around the wellhead?*  
Assets Covered **86257**  
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
32. Question Result, ID, References **NA, 114.114.LKRLSANN.P, 49 U.S.C. 60108(a)**  
Question Text *Do procedures provide for periodic checking of wellhead annuluses for indications of leaks (e.g., unexplained pressure variations)?*  
Assets Covered **86257**  
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
33. Question Result, ID, References **NA, 114.114.LKRLSFIELD.P, 49 U.S.C. 60108(a)**  
Question Text *Do procedures provide for leak surveys for well casing containment or geologic issues?*  
Assets Covered **86257**  
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
34. Question Result, ID, References **Sat, 114.114.TESTRELIEFVLV.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT, 114.GGBOOST)  
Question Text *Do relief valve testing procedures include measures to minimize natural gas releases?*  
Assets Covered **86257**  
Result Notes **OM Manual Section 7.14 - Emissions Prevention.**
35. Question Result, ID, References **Sat, 114.114.GNLDSGNCNFG.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT, 114.GGBOOST)  
Question Text *Do operation and maintenance procedures contain mechanisms for identifying potential design/configuration changes for reducing natural gas releases?*  
Assets Covered **86257**  
Result Notes **OM Manual Section 7.14 - Emissions Prevention.**
36. Question Result, ID, References **Sat, 114.LEAKPRONE.LKRLS.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT, 114.GGBOOST)  
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 **86257**  
Result Notes **OM Manual Section 7.14 - Emissions Prevention.**
37. Question Result, ID, References **Sat, 114.LEAKPRONE.LKRLSLKDATA.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT, 114.GGBOOST)  
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 **86257**  
Result Notes **OM Manual Section 7.14 - Emissions Prevention.**
38. Question Result, ID, References **Sat, 114.LEAKPRONE.LKMITGRPREXAMPLE.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT, 114.GGBOOST)  
Question Text *Do procedures identify cast iron, unprotected steel, wrought iron, and vintage plastic pipe with known leak issues?*  
Assets Covered **86257**  
Result Notes **OM Manual Section 7.14 - Emissions Prevention.**

39. Question Result, ID, **NA, 114.LEAKPRONE.LKMITGRPROTHER.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT, References 114.GGBOOST)  
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 **86257**  
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

## 114.GGBOOST: Section 114 - Gas Gathering & Boosting

40. Question Result, ID, References **NIC, SRN.114.INSPECTCVRG.S,** (also presented in: 114.GT, 114.UNGS)  
Question Text *What are your assets comprised of?*  
Assets Covered **86257**  
Result Notes **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.**
41. Question Result, ID, References **NIC, SRN.114.GASTRANSPORT.S,** (also presented in: 114.GT, 114.UNGS)  
Question Text *Do you transport natural gas as a specific commodity (i.e., not a byproduct or constituent of another substance)?*  
Assets Covered **86257**  
Result Notes **Gas transportation is bio gas only.**
42. Question Result, ID, References **NA, SRN.114.DRIVERENGINE.S,** (also presented in: 114.GT, 114.UNGS)  
Question Text *Do you use natural gas-fueled drivers or engines to compress natural gas?*  
Assets Covered **86257**  
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
43. Question Result, ID, References **NA, SRN.114.NGUSE.S,** (also presented in: 114.GT, 114.UNGS)  
Question Text *Do you use natural gas for fuel or power appurtenances or instrument gas on regulated facilities?*  
Assets Covered **86257**  
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
44. Question Result, ID, References **NA, 114.114.COMPRESSOR.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT, 114.UNGS)  
Question Text *Do the maintenance and operations procedures for compressors include provisions to minimize fugitive natural gas losses?*  
Assets Covered **86257**  
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
45. Question Result, ID, References **NA, 114.114.DRIVERENGINE.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT, 114.UNGS)  
Question Text *Do maintenance procedures include measures for monitoring and correcting incomplete combustion of natural gas in driver or engine exhausts and taking corrective action if identified?*  
Assets Covered **86257**  
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
46. Question Result, ID, References **Sat, 114.114.LKRLSID.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT)  
Question Text *Do procedures provide a methodology for identifying sources of fugitive natural gas emissions in the system?*  
Assets Covered **86257**  
Result Notes **OM Manual Section 7.14 - Emissions Prevention.**
47. Question Result, ID, References **Sat, 114.114.LKRLSVENT.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT, 114.UNGS)  
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 **86257**

Result Notes **OM Manual Section 7.14 - Emissions Prevention.**

48. Question Result, ID, References **Sat, 114.114.LKRLSUNEXPCTVENT.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT, 114.UNGS)  
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 **86257**  
Result Notes **OM Manual Section 7.14 - Emissions Prevention.**
49. Question Result, ID, References **Sat, 114.114.LKRLSLKDATA.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT, 114.UNGS)  
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 **86257**  
Result Notes **OM Manual Section 7.14 - Emissions Prevention.**
50. Question Result, ID, References **Sat, 114.114.TESTESD.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT)  
Question Text *Do procedures contain measures for ensuring ESD testing minimizes natural gas releases?*  
Assets Covered **86257**  
Result Notes **OM Manual Section 3.3 - Shutdown Procedures.**
51. Question Result, ID, References **Sat, 114.114.TESTRELIEFVLV.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT, 114.UNGS)  
Question Text *Do relief valve testing procedures include measures to minimize natural gas releases?*  
Assets Covered **86257**  
Result Notes **OM Manual Section 7.14 - Emissions Prevention.**
52. Question Result, ID, References **NA, 114.114.FLARE.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT)  
Question Text *Do procedures for flaring from pipeline facilities for transporting natural gas include measures for minimization of natural gas emissions?*  
Assets Covered **86257**  
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
53. Question Result, ID, References **Sat, 114.114.GNLDSGNCNFG.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT, 114.UNGS)  
Question Text *Do operation and maintenance procedures contain mechanisms for identifying potential design/configuration changes for reducing natural gas releases?*  
Assets Covered **86257**  
Result Notes **OM Manual Section 7.14 - Emissions Prevention.**
54. Question Result, ID, References **NA, 114.114.GNLCMPSTATION.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT)  
Question Text *Do procedures contain mechanisms for minimizing natural gas emissions from operations and maintenance activities within a compressor station (i.e., beyond compressor/driver-specific procedures)?*  
Assets Covered **86257**  
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
55. Question Result, ID, References **Sat, 114.LEAKPRONE.LKRLS.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT, 114.UNGS)  
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 **86257**  
Result Notes **OM Manual Section 7.14 - Emissions Prevention.**
56. Question Result, ID, References **Sat, 114.LEAKPRONE.LKRLSLKDATA.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT, 114.UNGS)  
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 **86257**  
Result Notes **OM Manual Section 7.14 - Emissions Prevention.**



57. Question Result, ID, References **Sat, 114.LEAKPRONE.LKMITGRPREXAMPLE.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT, 114.UNGS)  
Question Text *Do procedures identify cast iron, unprotected steel, wrought iron, and vintage plastic pipe with known leak issues?*  
Assets Covered **86257**  
Result Notes **OM Manual Section 7.14 - Emissions Prevention.**
58. Question Result, ID, References **NA, 114.LEAKPRONE.LKMITGRPROTHER.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT, 114.UNGS)  
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 **86257**  
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

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