

**Form A- Annual Review 8304**

UTC Standard Annual Review Inspection Report  
Intrastate Operators  
FORM A: Annual Review

**Inspector and Operator Information**

<b>Inspection ID</b> 8304	<b>Inspection Link</b> 8304	<b>Inspector - Lead</b> Scott Anderson	<b>Inspector - Assist</b>
<b>Operator</b> Tidewater Terminal Company	<b>Unit</b> Tidewater - Snake River Terminal	<b>Records Location - City &amp; State</b> Vancouver, WA	
<b>Inspection Start Date</b> 06-23-2021	<b>Inspection Exit Interview Date</b> 06-23-2021	<b>Engineer Submit Date</b> 06-23-2021	

**Inspection Summary**

You must include the following in your inspection summary:

- \*Inspection Scope and Summary
- \*Facilities visited and Total AFOD
- \* Summary of Significant Findings
- \* Primary Operator contacts and/or participants

This inspection was an annual review of Tidewater.

1 AFOD

No significant findings came as a result of this review

**Instructions and Ratings Definitions**

**INSPECTION RESULTS: Annual Review**

<b>Satisfactory Responses</b> 20	<b>Satisfactory List</b> 1,3,8,9,10,12,13,14,15,16,17,18,24,26,27,28,31,32,37,	<b>Number of Unanswered Questions</b> 0	<b>Unanswered List</b>
<b>Unsatisfactory Responses</b> 0	<b>Unsatisfactory List</b>		
<b>Area of Concern Responses</b> 0	<b>Area of Concern List</b>		
<b>Not Applicable Responses</b> 21	<b>Not Applicable List</b> 4,5,6,7,19,20,21,22,23,25,29,30,34,35,38,39,40,41,42,43,44		
<b>Yes Responses</b> 1	<b>Yes List</b> 36,	<b>No Responses</b> 0	<b>No List</b>
<b>Not Checked / Evaluated Responses</b> 0	<b>Not Checked / Evaluated List</b>		

\*\*If an item is marked Unsat, AOC, N/A, or N/C, an explanation must be included in the "Notes" block for that question and also summarized in the " SUMMARY OF REQUIRED COMMENTS" section at the end of this inspection form.

**Crew Inspection History**

Click Link for Full List of Crew Inspections

Determination crew inspection Date	Inspector	Unit	Type of Work	Foreman Name	Contractor Name	Comments / Observations for Operator
No crew inspections found						

**Facility Inspection History**

Link for Full List of Facility Inspections

Date	Inspection ID	Form A Operator Name	Other Company	Inspector	Type of Inspection	Do you have inspection pictures or file attachments?
No facility inspections found						

**Scheduled Inspection History**

**Annual Review Inspection History**

Year of Inspection	Facility - Operator	Unit Name	Inspection ID	Inspection Type	Inspection Status	Closed Date	Next Inspection Interval	SHAREPOINT
<b>Tidewater Terminal Company (16 Inspections)</b>								
2021	Tidewater Terminal Company	Tidewater- Snake River Terminal	8304	Standard - Annual Review	Pending			Documents
2020	Tidewater Terminal Company	Tidewater- Snake River Terminal	8077	LIMP - Liquid Transmission Integrity Management	Complete	11-24-2020	08-06-2023	Documents
2020	Tidewater Terminal Company	Tidewater- Snake River Terminal	8078	DA - Drug & Alcohol	Complete	11-17-2020	11-02-2024	Documents
2020	Tidewater Terminal Company	Tidewater- Snake River Terminal	8079	Standard Comprehensive - HL	Complete	10-02-2020	08-31-2023	Documents
2020	Tidewater Terminal Company	Tidewater- Snake River Terminal	8080	OM PPR LIQUID - Operations & Maintenance, Plans & Procedures Review	Complete	12-15-2020	12-10-2024	Documents
2020	Tidewater Terminal Company	Tidewater- Snake River Terminal	8081	Design, Testing & Construction - Liquid	Complete	12-28-2020	08-31-2021	Documents
2020	Tidewater Terminal Company	Tidewater- Snake River Terminal	8082	Standard - Annual Review	Complete	03-13-2020	03-04-2021	Documents

Year of Inspection	Facility - Operator	Unit Name	Inspection ID	Inspection Type	Inspection Status	Closed Date	Next Inspection Interval	SHAREPOINT
2019	Tidewater Terminal Company	Tidewater- Snake River Terminal	7710	Design, Testing & Construction - Liquid	Complete	12-28-2020	12-28-2021	Documents
2019	Tidewater Terminal Company	Tidewater- Snake River Terminal	7836	OQ - Operator Qualification	Complete	04-10-2019	04-09-2023	Documents
2019	Tidewater Terminal Company	Tidewater- Snake River Terminal	7837	Standard - Annual Review	Complete	04-15-2019	04-09-2020	Documents
2019	Tidewater Terminal Company	Tidewater- Snake River Terminal	7974	Incident Investigation	Complete	01-02-2020	06-19-2019	Documents
2018	Tidewater Terminal Company	Tidewater- Snake River Terminal	7563	Standard Comprehensive - HL	Complete	10-26-2018	08-02-2021	Documents
2018	Tidewater Terminal Company	Tidewater- Snake River Terminal	7564	PA - Public Awareness	Complete	10-26-2018	08-02-2022	Documents
2017	Tidewater Terminal Company	Tidewater- Snake River Terminal	7232	LIMP - Liquid Transmission Integrity Management	Complete	12-04-2017	09-14-2020	Documents
2016	Tidewater Terminal Company	Tidewater- Snake River Terminal	6764	OM PPR LIQUID - Operations & Maintenance, Plans & Procedures Review	Complete	10-25-2016	10-20-2020	Documents
2015	Tidewater Terminal Company	Tidewater- Snake River Terminal	6188	Standard Comprehensive - HL	Complete	07-01-2015	05-06-2018	Documents

**GAS System Operations History**

**Annual Report - Miles of Main**

Year	SYSTEM TOTAL Miles of Main	Miles of Service	SYSTEM TOTAL NO. of Services	Average Service Length
No reports found				

**Annual Report GAS Transmission Miles**

YEAR	Total Total Miles	e. Total tool mileage inspected in calendar year using in-line inspection tools
No reports found		

**Annual Report - Leaks**

Year	Cause of Leak Mains Total	Cause of Leak Mains Hazardous Total	Cause of Leak Services Total	Cause of Leak Services Hazardous Total	NUMBER OF KNOWN SYSTEM LEAKS AT END OF YEAR SCHEDULED FOR REPAIR
No reports found					

**Annual Report - EFV**

Operator	Year	Number of EFV's Installed This Calendar Year on Single Family Residential Services:	Estimated Number of EFV's in the system at the End of The Year:	Total Number of Services with EFV Installed During Year:	Estimated Number of Services with EFV In The System At The End of The Year:	* Total Number of Manual Service Line Shut-off Valves Installed During Year:	* Estimated Number of Services with Manual Service Line Shut-off Valves Installed in the System at End of Year:
No reports found							

**HL System Operations History**

**HL Annual Report - Miles of Pipe by Decade**

YEAR	Operator	Commodity Group	Part I - Total Miles of Pipe by Decade	Unknown	Pre-20s	1920-1929	1930-1939	1940-1949	1950-1959	1960-1969	1970-1979	1980-1989	1990-1999
2019	Tidewater Terminal Company	Refined and/or Petroleum (non-HVL)	6.83										1

**HL Annual Report - HL Miles / HCAs**

YEAR	Operator	Commodity Group	Total Segment Miles that Could Affect HCAs	High Population	Other Population	Drinking Water	Ecological Resource	Comm Navigable Water
2019	Tidewater Terminal Company	Refined and/or Petroleum (non-HVL)						6.83

**HL Annual Report - Breakout Tanks**

YEAR	Operator	Commodity Group	Crude Oil #5	Refined (nor HVL) #5
<b>Tidewater Terminal Company (1 Report)</b>				
2019	Tidewater Terminal Company	Refined and/or Petroleum (non-HVL)	0	

**ANNUAL REPORT: ACCURACY/TRENDS**

**Question #1.**

Was the Annual Report reviewed for accuracy and trends? If any trends were discovered, please describe.

**1. Result**

Satisfactory

**1. Notes**

Tidewater annual report submitted 6/8/21 for CY 2020. It was reviewed for accuracy and trends.

**Access to Complete Distribution Annual Report**

Year	SYSTEM TOTAL Miles of Main	Miles of Service	SYSTEM TOTAL NO. of Services	Average Service Length
No reports found				

**Access to Complete Transmission Annual Report**

YEAR	Operator	Commodity Group	Total Total Miles
No reports found			

**Access to Complete Hazardous Liquid Annual Report**

YEAR	Operator	Commodity Group
2019	Tidewater Terminal Company	Refined and/or Petroleum (non-HVL)

**DAMAGE PREVENTION**

**Annual Report Damage Prevention data**

Year	Operator	Number of Excavation Tickets	Total Number of Excavation Damages By Apparent Root Cause:	Locating Practices Not Sufficient:	One-Call Notification Practices Not Sufficient:	Excavation Practices Not Sufficient:	Other:	Number of Services	Total Leaks - Excavation Damage	Total Main Leaks	Miles of Service MAIN	Number of Leaks per Mile of MAIN	Total Leaks Per 1,000 Locates	Re
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No damages found

**DIRT data on mismarks for prior year**

Damage Cause	Number of Reports
No records found	

**DIRT Timeliness - Prior Year Reports must be submitted within 45 days of the damage.**

SubmitCompanyID - UTCfinalName	Number of Reports
No records found	

**Question #2.**

Review the following damage prevention items:

**Q2. Is the damage prevention information in the annual report complete?**  
http://yes

**Q2.b. Is the annual report damages root cause information complete and accurate?**  
yes

**Q2.c. Does the operator have a process to evaluate practices not sufficient" category?**  
yes

**Q2.d. Does the operator follow a process to evaluate the cause of "Locating practices not sufficient" category?**  
yes

**Q2.e. Is the operator or its contractor qualified and following procedures for locating and marking facilities?**  
Tidewater procedure 208, Third party damage prevention

**Q2.f. Is the operator appropriately requalifying loc deficiencies?**  
yes

**Q2.g. What is the number of damages resulting from mismarks?**  
0

**Q2.h. What is the number of damages resulting from not locating within the time requirements?**  
0

**Q2.i. Is the operator appropriately addressing disc excavation damage?**  
yes

**Q2.j. Are mapping corrections timely and according to written procedures?**  
yes

**Q2.k. Does the operator follow a process to evaluate causes for damages listed "Excavation Practices Not Sufficient"?**  
yes

**Q2.l. Is the operator appropriately focusing damage address the causes of excavation damage?**  
yes

**2. Notes**

Tidewater participates in on-call. OQ qualified Tidewater employees perform locates when a ticket is created. When excavation is occurring near the line a Tidewater employee is on-site observing.

**NPMS SUBMISSIONS/CHANGES**

**Question #3.**

For transmission operators, has the operator submitted information to the NPMS database, along with changes made after the original submission? Satisfactory

**3. Result**

**3. Notes**

Reviewed NPMS email receipt for submittal for 2020. There were no changes.

**INCIDENT/SRC/AOC REPORTS REVIEW**

**Question #4**

Were there any federally reportable incidents during the previous year? Are there any discernable trends to these incidents?

**4. Results**

Not Applicable

**4. Notes**

No federal reportables.

**Q4: Federally reportable incidents**

NotificationID	Operator	Company	NRC #	Assigned Engineer	Date & Time of Incident	Street Address of event/incident	Incident Address: City	Closure Date	Reporting Level
No incident notifications found									

**Question #5.**

Review operator records of previous year's accidents and failures including reported third party damage and leak response. Is the operator ensuring appropriate evaluation and response as required in 192.617 (Gas) or 195.402 (HL) to determine cause of failure? Is the operator taking appropriate steps to minimize the possibility of reoccurrence?

**5. Result**

Not Applicable

**5. Notes**

None in the previous year

**Question #6.**

Review incident reports for the previous year for accuracy and identify any trends. If any trends discovered please describe. (Please see list of incident data at end of this report)

**Q6: Incident Reports**

NotificationID	Inspector	Company	Street Address of event/incident	Date & Time of Incident	Is 30-Day Report Received?	Reporting Level
No incident notifications found						

**6. Result**

Not Applicable

**6. Notes**

No incidents in the previous year.

**Question #7.**

Were there reportable or unreportable safety related conditions during the previous year? If yes please describe.

**Q7: Report of SRCs**

NotificationID	Company	Safety-Related Condition	SafetyRelatedConditionChoices	Reportable?	Date & Time of Incident	Company Notified Date	Report Date
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**7. Result**

Not Applicable

Tidewater Terminal Company (1 Incident Notification)

NotificationID	Company	Safety-Related Condition	SafetyRelatedConditionChoices	Reportable?	Date & Time of Incident	Company Notified Date	Report Date
3523	Tidewater Terminal Company	✓	Exceed MAOP plus build-up	Unknown-To be Determined	06-02-2019 10:18 AM	06-02-2019 12:40 AM	06-11-2019 07:40 AM

**7. Notes**

No SRCs in 2020

**Question #8.**

For transmission systems, were there any abnormal operating conditions (as described in 192.605 (c) or 195.402(d)) since the last annual review? If yes please describe.

**8. Result**

Satisfactory

**8. Notes**

Tidewater had 6 AOCs in the previous year.

- 2/11/2020 – Loss of Communication SRT Inbound Outbound Pipeline System. Tidewater employee discovered he had no-cell service, he checked the office phones and found them to be Out of Service also.  
He was able to call and gain contact with David at Marathon (NWT), but they were unable to receive inbound calls from David with Marathon or other calls. They tried numerous times to reach the manager on call, without success. He then contacted David at Marathon and instructed him to contact the Control Room in Houston to do a controlled shut down due to an AOC Loss of Communication.  
At 21:30 Ethan instructed Marathon operator due to the communication issue to perform a controlled shutdown of the Inbound 2D15 Batch #4639. The pipeline was shut down and secured by 21:39 PM.  
At 22:31 Ethan regained cell service and was able to contact Tidewater Maintenance Manager Ron McClary, they explain the communication outage and that they had regained communications with Marathon and requested the OK to restart the Inbound 2D15 batch. Permission was giving by Ron McClary.  
22:48 Inbound 2D-15 Batch #4639 was restarted without incident and continue to finish under normal operations.
  - Office Phone communicate via MPLS (Century link) thru the Internet to Microsoft. The phone be changed to MPLS to Microsoft cutting out the Internet. Office phones would not be affected by an outage over the internet. Critical cell phones in the Terminal company would go to a Dual Sim cards, these phones would have access to both Version and AT&T cell services. This is being researched as of this date.
- 4/22/2020 – High Pressure Alarm due to Failing Pressure Relief. SRT Inbound Gas system had a High Pressure alarm@ 11:40 am on 4/21/2020 Inspect and Test pressure Relief @ 100 psi Pressure Relief was disassembled and inspected. No issue were noted Pressure Relief was re-installed and Tested, Pressure Relief worked properly relieving at 100 psi
- 5/29/2020 – Control Valve on the Receiving side Failed to Open. Control valve on receiving side failed to open causing the pipeline to Shut down on High Pressure Max Pressure 674 psi. Control valve was inspected and exercised, control valve was found to be working properly once it was manually operated. Pipeline was restarted and closely monitored.
- 8/3/2020 – Abnormal Change in Flow Rate or Pressure. During a startup of an outbound pipeline a High-Pressure alarm was activated. The SCADA system was checked and it was verified that it was a false alarm max pressure reached was 163 psig.
- 8/18/2020 – Flow Alarm in a Idle State. This alarm was caused by slack in the Inbound 2D 15 line, the elevation difference between the meters, the temperature increase. This caused movement within the Ultra Sonic meter on the Marathon side that indicated flow when the air and the fuel cause the meter to register flow when there was no flow just movement within the meter. The line was flushed to push out any existing air.
- 8/19/2020 – Unintended Shutdown. This incident was caused by a Power surge that cause the outbound pump to shut down during an electrical storm. The operator responded to the alarm and notify the manager on call. The terminal operator inspected the pump and SCADA to verify pressure were within operating range. Then received authorization to restart the pipeline.

## 📌 O&M & EMERGENCY PROGRAMS

**Question #9.**

Is the O&M Manual up to date and were changes made in the previous year?

Operator Manuals on Sharepoint

**9. Result**

Satisfactory

**9. Notes**

Tidewater O&M was reviewed 4/20/2020, changes were:

- Distribution list - removed Alan Rathbun, new address added
- Updated Josh Jarman title and address
- Procedure 401.1 updated NACE references
- Procedure 403.4 coated pipelines (b) NACE SP0169-2013, (c) updated NACE SP0169-2013
- Procedure 403.10 breakout tank bottoms under cathodic protection (a) updated NACE SP 0193-2016
- Changed all reference from Andeavor to NWT (Northwest Terminals)
- Removed appendix 500A Exposed Pipe Inspection and made it a stand alone procedure
- Removed appendix 500B Pipeline Replacement and made it a stand alone procedure
- Removed appendix 500C Coating inspection and repair and made it a stand alone procedure
- Gammar and verbiage changes throughout manual

**Question #10.**

If changes to the O&M were made, are changes acceptable?

**10. Result**

Satisfactory

**10. Notes****Question #11.**

Were emergency plans changed during the previous year?

**11. Result**

Satisfactory

**11. Notes**

Changes in 2020 were clerical and updates to contacts names and phone numbers

**Question #12.**

Were any changes to emergency plans satisfactory?

**12. Result**

Satisfactory

**12. Notes**

## 📌 INTEGRITY MANAGEMENT PROGRAMS

**Question #13**

Were there changes to the Integrity Management programs (TIMP, DIMP or both, as applicable)?

**13. Result**

Satisfactory

**13. Notes**

There were changes. Tidewater IMP was reviewed and revised by third party vendor TRC for better flow and understanding. Section 7.2 was updated to include more detailed information on breakout tank facilities continuing evaluations and assessment

**Question #14.**

Is the DIMP/TIMP up to date? What are the results of the operator's program review (effectiveness evaluation) (DIMP every 5 years)?

**14. Result**

Satisfactory

**14. Notes**

Tidewaters IMP is up to date.

**Question #15**

Are IMP program changes acceptable?

**15. Result**

Satisfactory

**15. Notes****Question #16**

Was appropriate assessment/ repair work conducted during the past year? (monitor progress of IMP activities)

**16. Results**

Satisfactory

**16. Notes**

A tool run was done in 2020. No repairs or digs were required from ILI data. Two sites were dug for validation, a clock spring was installed in a minor corrosion spot. The other spot was a dent that needed a re-wrap.

**Question #17**

Does the operator's HCA location data correspond to the positional data located in UTC GIS?

**17. Results**

Satisfactory

**17. Notes**

All of Tidewater's pipe is considered an HCA.

**Question #18**

What assessment work is planned for the upcoming year?

**18. Results**

Satisfactory

**18. Notes**

A smart pig was run 6/16/21, data is still being analyzed by the vendor. Initial results came back with no issues.

**Question #19**

Within the operator's DIMP, are low pressure systems evaluated for overpressure threats?

**19. Results**

Not Applicable

**19. Notes**

No DIMP, this is a liquid system.

**Question #20**

Did the operator develop and follow specific procedures for low pressure system construction or maintenance projects? (Note: this question is revisited in greater detail in the ADB review section)

**20. Results**

Not Applicable

**20. Notes**

No low pressure systems, this is a liquid system.

**Question #21**

Are plastic pipe and components that have shown a record of defects/leaks being mitigated through the DIMP plans?

**21. Results**

Not Applicable

**21. Notes**

No plastic pipe, this is a liquid system.

**Question #22**

Has appropriate DIMP remediation work occurred during the past year? (monitor progress of DIMP activities)

**22. Results**

Not Applicable

**22. Notes**

No DIMP, this is a liquid system.

**Question #23**

What DIMP remediation work is anticipated for upcoming year?

**23. Results**

Not Applicable

**23. Notes**

No DIMP, this is a liquid system.

## QO PROGRAM

**Question #24**

Is the OQ program up to date? Were there changes to the Operator Qualification (OQ) program in the last year? If yes, please describe.

**24. Results**

Satisfactory

**24. Notes**

No changes in the previous year. Tidewater review done 6/30/2020

**Question #25**

Are the OQ plan updates satisfactory?

**25. Results**

Not Applicable

**25. Notes****Question #26**

Are personnel performing covered tasks (including contractors) properly qualified and requalified at intervals determined in the operator's plan?

**26. Results**

Satisfactory

**26. Notes**

Energy WorldNET is used by Tidewater to qualify staff. Section 5 in the OQ plan lays out the qualification process for employees. OQ intervals are 3 years for individuals.

## PUBLIC AWARENESS PROGRAM

**Question #27**

Is the PA program up to date? And were there changes to the Public Awareness (PA) program within the last year?

**27. Results**

Satisfactory

**27. Notes**

PA program is up to date. Changes were updates to contacts.

**Question #28**

Are changes to the PA program satisfactory?

**28. Results**

Satisfactory

**28. Notes**

## CONTROL ROOM PROGRAM

**Question #29**

Is the CRM program up to date? And were there changes to the Control Room Management (CRM) program within the last year?

**29. Results**

Not Applicable

**29. Notes**

No control room.

**Question #30**

Are the CRM program changes satisfactory?

**30. Results**

Not Applicable

**30. Notes**

No control room

## SAFETY MANAGEMENT SYSTEM API 1173

### Question #31

### 31. Results

Is the operator developing and implementing an API 1173 Safety Management System? Satisfactory

### 31. Notes

API 1173 is not being used. The operator has a detailed safety management system in the IMP.

## INSPECTOR ASSESSMENT OF INSPECTION UNITS

### Question #32

### 32. Results

Are inspection units broken down appropriately? Do you recommend any changes to inspection units? Satisfactory

### 32. Notes

There is only 1 unit for Tidewater.

### Q32: List of current inspection units

Unit Name	Distribution/Transmission	Intrastate or Interstate?	GAS or LIQUID
Tidewater Terminal Company (1 Unit)			
Tidewater- Snake River Terminal	Hazardous Liquid	Intrastate	Liquid

## OPERATOR'S PUBLIC WEB PAGE

### Question #33

### 33. Results

For informational purposes: Using the drop down selections available in the "Results" block, indicate whether the operator's web page contains the information listed by placing a check in the box adjacent to all items that are present.

Q33.A Pipeline Purpose and Reliability ; Q33.B Damage Prevention ; Q33.C Pipe Location Information ; Q33.D How to get additional information ; Q33.E National Pipeline Mapping System ; Q33.F On Call Requirements ; Q33.G Potential Hazards ; Q33.H Prevention Measures ; Q33.I Leak/Damage Recognition ; Q33.K Pipeline Location Information ; Q33.L Integrity Management Programs ; Q33.M Emergency Preparedness

### 33. Notes

## ADVISORY BULLETIN REVIEW

### Question #34

Is there potential for damage to the operator's pipeline facilities caused by flooding, river scour, or channel migration?

### ADB 2019-01

ADB 2019-01 Flood Mitigation

### 34. Results

Not Applicable

### 34. Notes

### Question #35

If "YES" to Q34, did the operator take appropriate action in accordance with the guidance contained ADB 2019-01? Discuss ADB's guidance with operator's representative, and annotate any concerns.

### ADB 2019-01

ADB 2019-01: Flood Mitigation

### 35. Results

Not Applicable

### 35. Notes

### Question #36

Is there potential for the operator's system to be damaged by earth movement or other seismic/geological activities?

### ADB 2019-02

ADB 2019-02: Earth Movement/Geological Hazards

### 36. Results

YES

### 36. Notes

Tidewater Systems Operations Manual section 5.2.8 discusses earth movement or other seismic/geological activities

### Question #37

If "YES" to Q36, did the operator take appropriate action according to ADB 2019-02? Discuss suggested actions from ADB with operator's representative and annotate any concerns.

### ADB 2019-02

ADB 2019-02: Earth Movement/Geological Hazards

### 37. Results

Satisfactory

### 37. Notes

5.2.8 discusses earth movement or other seismic/geological activities

### Question #38

Does the operator have any indoor meter sets or regulators in their system?

### ADB 2020-01

ADB 2020-01 Inside Meter Sets

### 38. Results

Not Applicable

### 38. Notes

No indoor meter sets, this is a liquid system.

### Question #39

If operator's system has indoor meter sets/regulators, did the operator review ADB 2020-0115? Discuss ADB guidance with operator's representative and annotate any concerns. Particular attention must be given to the operator's plan to conduct leak surveys, AC inspections, and other maintenance activities in locations that are difficult to access, as well as the inclusion of inside meters/regulators within the operator's DIMP plan, as applicable.

### ADB 2020-01

ADB 2020-01 Inside Meter Sets

### 39. Results

Not Applicable

### 39. Notes

No indoor meter sets, this is a liquid system.

### Question #40

Does the operator have a detailed record of locations for all indoor meter sets/regulators within their system?

### ADB 2020-01

ADB 2020-01 Inside Meter Sets

### 40. Results

Not Applicable

### 40. Notes

No indoor meter sets, this is a liquid system.

**Question #41**

Does the operator have any low pressure systems?

**ADB 2020-02**

ADB 2020-02 Low Pressure Systems

**41. Results**

Not Applicable

**41. Notes**

No low pressure systems, this is a liquid operator.

**Question #42**

If "YES" to Q41, did the operator review ADB 2020-0025 for Overpressure Protection of Low-Pressure Natural Gas Distribution Systems? Review ADB guidance with operator and annotate any concerns.

**ADB 2020-02**

ADB 2020-02 Low Pressure Systems

**42. Results**

Not Applicable

**42. Notes**

No low pressure systems, this is a liquid operator.

**Question #43**

For low pressure construction/maintenance projects, does the operator have a process for review of engineering plans and constructibility reviews that are carried out through all applicable departments? Do all applicable departments review project plans for accuracy, completeness and correctness? How are control procedures developed that could identify system threats that could result in a common failure mode? How is the operator mitigating risk in their low pressure system?

**ADB 2020-02**

ADB 2020-02 Low Pressure Systems

**43. Results**

Not Applicable

**43. Notes**

No low pressure systems, this is a liquid operator.

**Question #44**

Does the operator include all low-pressure system risks in their DIMP program appropriately?

**ADB 2020-02**

ADB 2020-02 Low Pressure Systems

**44. Results**

Not Applicable

**44. Notes**

No low pressure systems, no DIMP, this is a liquid operator.

## SUMMARY OF REQUIRED COMMENTS

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**COMMENTS:** Required for any ratings other than Satisfactory. Summarize/consolidate entries from the "Notes" blocks above. Ensure you annotate the question number for each comment.