

Inspection Output (IOR)

Generated on 2022.July.21 15:41

Report Filters

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

Results Unsat,Concern

Inspection Information

Inspection Name	8507-CNGC Section 114 Distribution	Operator(s)	CASCADE NATURAL GAS CORP (2128) Lead Dennis Ritter	Plan Submitted	03/31/2022
Status	PLANNED	Observer(s)	David Cullom, Lex Vinsel, Anthony Dorrough, Derek Norwood, Scott Anderson, Bruce Perkins, Kevin Hennessy, Darren Tinnerstet, Jeff Brooks	Plan Approval	03/31/2022 by Scott Rukke
Start Year	2022	Supervisor	Scott Rukke	All Activity Start	07/18/2022
System Type	GD	Director	Sean Mayo	All Activity End	07/21/2022
Protocol Set ID	GD.2022.02			Inspection Submitted	--
				Inspection Approval	--

Inspection Summary

Inspection Scope and Summary

This is an inspection in response to advisory bulletin underscoring to pipeline and pipeline facility operators requirements to minimize methane emissions in the Protecting our Infrastructure of Pipelines and Enhancing Safety (PIPES) Act of 2020. The PIPES Act directs pipeline operators to update their inspection and maintenance plans to address the elimination of hazardous leaks, and to minimize natural gas releases from pipeline facilities. The updated plans must also address the replacement or remediation at facilities that historically have been known to experience leaks.

Facilities visited and Total AFOD

Inspection was conducted via MS Teams. No facilities were visited.

0.6 AFOD

Summary of Significant Findings

(DO NOT Discuss Enforcement options)

One area of concern relating to operator's procedures do not require all above ground leaks including those eliminated by lubrication, adjustment, tightening, be included and counted as leaks.

Exit interview conducted July 20, 2022. Colby Lundstrom CNGC, Dennis Ritter WUTC

Primary Operator contacts and/or participants

Colby Lundstrom, Manager Compliance and Operations Programs

Operator executive contact and mailing address for any official correspondence

Pat Darras, VP Engineering and Ops Services

400 North 4th Street, Bismarck, North Dakota 58501

Scope (Assets)

Short # Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1. 88961 (75)	Cascade Natural Gas-HEADQUARTERS	unit	88961	Storage Fields Bottle/Pipe - Holders Offshore GOM OCS	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.	88961 (75)	--	114.GD	P, R, O, S	Detail	--

Plan Implementations

Activity # Name	SMART Act#	Start Date End Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Inspected	Total	Required % Complete
1. Procedures	--	07/18/2022 -- 07/21/2022	--	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

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1.	Attendance List	Procedures	COMPLETED	07/20/2022	Procedures	88961 (75)

Results (Unsat,Concern values, 1 results)

2 (instead of 1) 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 **Concern, 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 88961 (75)

Result Notes Part of DIMP, OPS 1000 eg, In 2014, WUTC asked pipeline operators to identify and quantify a list of high risk pipe in their systems. Since then, operators have submitted a pipeline replacement plan every 2 years with a list and schedule to remove, replace or repair that pipe. CNGC has poor or base steel pipe they have quantified and are replacing. CNGC does not have ductile, cast iron, copper or PVC pipe in their system. This is all part of DIMP.

CNGC does not require currently track or record those above ground leaks eliminated by lubrication, adjustment or tightening if those leaks are part annual regulator station maintenance--General Inspection and Maintenance, 3.3 Inspect for Leaks, Section 3.3.3 non hazardous above ground leaks.

114.MM: Section 114 - Master Meter

2. Question Result, ID, References **Concern, 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 **88961 (75)**

Result Notes **Part of DIMP, OPS 1000 eg, In 2014, WUTC asked pipeline operators to identify and quantify a list of high risk pipe in their systems. Since then, operators have submitted a pipeline replacement plan every 2 years with a list and schedule to remove, replace or repair that pipe. CNGC has poor or base steel pipe they have quantified and are replacing. CNGC does not have ductile, cast iron, copper or PVC pipe in their system. This is all part of DIMP.**

CNGC does not require currently track or record those above ground leaks eliminated by lubrication, adjustment or tightening if those leaks are part annual regulator station maintenance--General Inspection and Maintenance, 3.3 Inspect for Leaks, Section 3.3.3 non hazardous above ground leaks.

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Inspection Results (IRR)

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• 88961 (75) (40)

Inspection Results Report (ALL Non-Empty Results) - Scp_PK 88961 (75)

Row	Assets	Result (Note ¹)	Sub-Group	Qst #	Question ID	References	Question Text
1.	88961 (75)	NIC	2	114.GD	1. SRN.114.INSPECTCVRG.S		What are your assets comprised of?
2.	88961 (75)	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.	88961 (75)	NA	2	114.GD	3. SRN.114.DRIVERENGINE.S		Do you use natural gas-fueled drivers or engines to compress natural gas?
4.	88961 (75)	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.	88961 (75)	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.	88961 (75)	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.	88961 (75)	Sat	2	114.GD	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?
8.	88961 (75)	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.	88961 (75)	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.	88961 (75)	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?
11.	88961 (75)	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

Inspection Results Report (ALL Non-Empty Results) - Scp_PK 88961 (75)

Row	Assets	Result (Note ¹)	Sub-Group	Qst #	Question ID	References	Question Text
							reduce the associated volume?
12.	88961 (75)	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.	88961 (75)	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.	88961 (75)	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.	88961 (75)	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.	88961 (75)	Sat	2	114.GD	16. 114.114.GNLDSGNCNFG.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.	88961 (75)	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.	88961 (75)	Concern	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.	88961 (75)	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.	88961 (75)	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 those specifically identified in Section 114?
21.	88961 (75)	NIC	2	114.MM	1. SRN.114.INSPECTCVRG.S		What are your assets comprised of?

Inspection Results Report (ALL Non-Empty Results) - Scp_PK 88961 (75)

Row	Assets	Result (Note ¹)	Sub-Group	Qst #	Question ID	References	Question Text
22.	88961 (75)	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.	88961 (75)	NA	2	114.MM	3. SRN.114.DRIVERENGINE.S		Do you use natural gas-fueled drivers or engines to compress natural gas?
24.	88961 (75)	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.	88961 (75)	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.	88961 (75)	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.	88961 (75)	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.	88961 (75)	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.	88961 (75)	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.	88961 (75)	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.	88961 (75)	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.	88961 (75)	Sat	2	114.MM	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?
33.	88961 (75)	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

Inspection Results Report (ALL Non-Empty Results) - Scp_PK 88961 (75)

Row	Assets	Result (Note ¹)	Sub-Group	Qst #	Question ID	References	Question Text
							would reduce natural gas releases from regulators?
34.	88961 (75)	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.	88961 (75)	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.	88961 (75)	Sat	2	114.MM	16. 114.114.GNLDSGNCNFG.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.	88961 (75)	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.	88961 (75)	Concern	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.	88961 (75)	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.	88961 (75)	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.

Report Parameters: All non-empty Results

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Inspection Output (IOR)

Generated on 2022.July.21 15:57

Report Filters

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

Results Unsat,Concern

Inspection Information

Inspection Name	8507-CNGC Section 114 Transmission	Operator(s)	CASCADE NATURAL GAS CORP (2128) Lead Dennis Ritter	Plan Submitted	03/31/2022
Status	PLANNED	Observer(s)	David Cullom, Lex Vinsel, Anthony Dorrough, Deborah Becker, Derek Norwood, Scott Anderson, Darren Tinnerstet	Plan Approval	03/31/2022 by Scott Rukke
Start Year	2022	Supervisor	Scott Rukke	All Activity Start	07/18/2022
System Type	GT	Director	Sean Mayo	All Activity End	07/21/2022
Protocol Set ID	GT.2022.02			Inspection Submitted	--
				Inspection Approval	--

Inspection Summary

Inspection Scope and Summary

This is an inspection in response to advisory bulletin underscoring to pipeline and pipeline facility operators requirements to minimize methane emissions in the Protecting our Infrastructure of Pipelines and Enhancing Safety (PIPES) Act of 2020. The PIPES Act directs pipeline operators to update their inspection and maintenance plans to address the elimination of hazardous leaks, and to minimize natural gas releases from pipeline facilities. The updated plans must also address the replacement or remediation at facilities that historically have been known to experience leaks. CNGC does not have underground storage facilities or master meters or gas gathering or boosting.

Facilities visited and Total AFOD

Inspection was conducted via MS Teams. No facilities were visited.

0.6 AFOD

Summary of Significant Findings

(DO NOT Discuss Enforcement options)

Transmission: Several issues pertaining to CNGC's reciprocating compressor station in the Mt Vernon District were noted:

- These types of engines inherently represent a larger potential release volume than a centrifugal compressor. CNGC should know if there are emissions coming from the compressor and write a procedure to minimize such emissions.
- It was noted that CNGC does annual exhaust stack emissions testing for the Mt. Vernon compressor. It appears this is required by an air quality permit issued by Northwest Clean Air Agency. This testing is for CO, and VEO (visible emission opacity). A procedure should be available stating the basis for the stack testing and should include methane. The procedure should state the compliance thresholds and establish what required actions are taken for noncompliance.
- CP 742 does not require Emergency Shut Down (ESD) for the compressor be completed to minimize emissions. In describing typical ESD testing, it appears the compressor is not running and that gas is not vented. However, the procedure does not specify.

Exit interview conducted July 20, 2022. Colby Lundstrom CNGC, Dennis Ritter WUTC

Primary Operator contacts and/or participants

Operator executive contact and mailing address for any official correspondence

Pat Darras, VP Engineering and Ops Services

400 North 4th Street, Bismarck, North Dakota 58501

Scope (Assets)

#	Short Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1.	88963 (1,877)	Cascade Natural Gas-TRANSMISSION	unit	88963	Bottle/Pipe - Holders Vault Offshore GOM OCS CDA AMAOP	24	24	21		87.5%

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

Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	88963 (1,877)	--	114	P, R, O, S	Detail	--

Plan Implementations

Activity #	Name	SMART Act#	Start Date	End Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Inspected	Total	Required % Complete
1.	Procedures	--	07/18/2022	07/21/2022	--	all planned questions	all assets	all types	24	24	21		87.5%

- 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 (Unsat, Concern values, 3 results)

8 (instead of 3) 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 **Concern, 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 88963 (1,877)

Result Notes Compressor in Mount Vernon, CP 742. Compressor station has LEL detectors inside

structure, if gas is detected Gas Control will receive an "Alert or Alarm", notification to

Field Operations will be made to investigate/remediate.

Step 8.11. Pressurizing, leak testing and purging procedures – review steps 8.11.1 to 8.11.7.

Are at the station at least once/month

Have not looked into packing and other ways to reduce emissions.

ESD does testing does not vent gas. Does not believe they flare or move gas from HP to lower pressures to avoid venting.

2. Question Result, ID, References Concern, 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 88963 (1,877)

Result Notes **OPS 742**

Procedure does not specify testing exhaust. CNGC does test the exhaust gas annually by third party. Not sure this is sufficient to know if methane emissions are found using this testing process

3. Question Result, ID, References Concern, 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 88963 (1,877)

Result Notes CP 742 Compressor Station O&M, 4/7/22. Section 8.7.2 states the ESDs shall be tested annually, but does not state that should be done live or with the station idled. According to CNGC when remote or onsite emergency shutdown is tested, the compressor is not running.

eliminating gas loss to the atmosphere.

114.UNGS: Section 114 - Underground Natural Gas Storage

4. Question Result, ID, References Concern, 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 88963 (1,877)

Result Notes Compressor in Mount Vernon, CP 742. Compressor station has LEL detectors inside

structure, if gas is detected Gas Control will receive an "Alert or Alarm", notification to

Field Operations will be made to investigate/remediate.

Step 8.11. Pressurizing, leak testing and purging procedures – review steps 8.11.1 to 8.11.7.

Are at the station at least once/month

Have not looked into packing and other ways to reduce emissions.

ESD does testing does not vent gas. Does not believe they flare or move gas from HP to lower pressures to avoid venting.

5. Question Result, ID, References **Concern, 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 **88963 (1,877)**
Result Notes **OPS 742**

Procedure does not specify testing exhaust. CNGC does test the exhaust gas annually by third party. Not sure this is sufficient to know if methane emissions are found using this testing process

114.GGBOOST: Section 114 - Gas Gathering & Boosting

6. Question Result, ID, References **Concern, 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 **88963 (1,877)**
Result Notes **Compressor in Mount Vernon, CP 742. Compressor station has LEL detectors inside**

structure, if gas is detected Gas Control will receive an "Alert or Alarm", notification to Field Operations will be made to investigate/remediate.

Step 8.11. Pressurizing, leak testing and purging procedures – review steps 8.11.1 to 8.11.7.

Are at the station at least once/month

Have not looked into packing and other ways to reduce emissions.

ESD does testing does not vent gas. Does not believe they flare or move gas from HP to lower pressures to avoid venting.

7. Question Result, ID, References **Concern, 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 **88963 (1,877)**
Result Notes **OPS 742**

Procedure does not specify testing exhaust. CNGC does test the exhaust gas annually by third party. Not sure this is sufficient to know if methane emissions are found using this testing process

8. Question Result, ID, References **Concern, 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 **88963 (1,877)**

Result Notes **CP 742 Compressor Station O&M, 4/7/22. Section 8.7.2 states the ESDs shall be tested annually, but does not state that should be done live or with the station idled. According to CNGC when remote or onsite emergency shutdown is tested, the compressor is not running.**

eliminating gas loss to the atmosphere.

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Inspection Results (IRR)

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• 88963 (1,877) (55)

Inspection Results Report (ALL Non-Empty Results) - Scp_PK 88963 (1,877)

Row	Assets	Result (Note ¹)	Sub-Group	Qst #	Question ID	References	Question Text
1.	88963 (1,877)	NIC	3	114.GT	1. SRN.114.INSPECTCVRG.S		What are your assets comprised of?
2.	88963 (1,877)	NIC	3	114.GT	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.	88963 (1,877)	NIC	3	114.GT	3. SRN.114.DRIVERENGINE.S		Do you use natural gas-fueled drivers or engines to compress natural gas?
4.	88963 (1,877)	NIC	3	114.GT	4. SRN.114.NGUSE.S		Do you use natural gas for fuel or power appurtenances or instrument gas on regulated facilities?
5.	88963 (1,877)	Concern	3	114.GT	5. 114.114.COMPRESSOR.P	49 U.S.C. 60108(a)	Do the maintenance and operations procedures for compressors include provisions to minimize fugitive natural gas losses?
6.	88963 (1,877)	Concern	3	114.GT	6. 114.114.DRIVERENGINE.P	49 U.S.C. 60108(a)	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?
7.	88963 (1,877)	Sat	2	114.GT	7. 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?
8.	88963 (1,877)	Sat	3	114.GT	8. 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

Inspection Results Report (ALL Non-Empty Results) - Scp_PK 88963 (1,877)

Row	Assets	Result (Note ¹)	Sub-Group	Qst #	Question ID	References	Question Text
							from operations and maintenance?
9.	88963 (1,877)	Sat	3	114.GT	9. 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?
10.	88963 (1,877)	Sat	3	114.GT	10. 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?
11.	88963 (1,877)	Sat		114.GT	11. 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?
12.	88963 (1,877)	Sat		114.GT	12. 114.114.LKMITGRPRREPAIR.P	49 U.S.C. 60108(a)	Do procedures provide alternatives to cutouts (to reduce emissions)?
13.	88963 (1,877)	Concern	2	114.GT	13. 114.114.TESTESD.P	49 U.S.C. 60108(a)	Do procedures contain measures for ensuring ESD testing minimizes natural gas releases?
14.	88963 (1,877)	Sat	3	114.GT	14. 114.114.TESTRELIEFVLV.P	49 U.S.C. 60108(a)	Do relief valve testing procedures include measures to minimize natural gas releases?
15.	88963 (1,877)	Sat	2	114.GT	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.	88963 (1,877)	Sat	3	114.GT	16. 114.114.GNLDSGNCNFG.P	49 U.S.C. 60108(a)	Do operation and maintenance procedures contain mechanisms for identifying potential design/configuration

Inspection Results Report (ALL Non-Empty Results) - Scp_PK 88963 (1,877)

Row	Assets	Result (Note ¹)	Sub-Group	Qst #	Question ID	References	Question Text
							changes for reducing natural gas releases?
17.	88963 (1,877)	Sat	2	114.GT	17. 114.114.GNLCMPSTATION.P	49 U.S.C. 60108(a)	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)?
18.	88963 (1,877)	Sat	3	114.GT	18. 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?
19.	88963 (1,877)	Sat	3	114.GT	19. 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?
20.	88963 (1,877)	NA	3	114.GT	20. 114.LEAKPRONE.LKMITGRPEXAMPLE.P	49 U.S.C. 60108(a)	Do procedures identify cast iron, unprotected steel, wrought iron, and vintage plastic pipe with known leak issues?
21.	88963 (1,877)	NA	3	114.GT	21. 114.LEAKPRONE.LKMITGRPOTHER.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?

Inspection Results Report (ALL Non-Empty Results) - Scp_PK 88963 (1,877)

Row	Assets	Result (Note ¹)	Sub-Group	Qst #	Question ID	References	Question Text
22.	88963 (1,877)	NIC	3	114.UNGS	1. SRN.114.INSPECTCVRG.S		What are your assets comprised of?
23.	88963 (1,877)	NIC	3	114.UNGS	2. SRN.114.GASTRANSPORT.S		Do you transport natural gas as a specific commodity (i.e., not a byproduct or constituent of another substance)?
24.	88963 (1,877)	NIC	3	114.UNGS	3. SRN.114.DRIVERENGINE.S		Do you use natural gas-fueled drivers or engines to compress natural gas?
25.	88963 (1,877)	NIC	3	114.UNGS	4. SRN.114.NGUSE.S		Do you use natural gas for fuel or power appurtenances or instrument gas on regulated facilities?
26.	88963 (1,877)	Concern	3	114.UNGS	5. 114.114.COMPRESSOR.P	49 U.S.C. 60108(a)	Do the maintenance and operations procedures for compressors include provisions to minimize fugitive natural gas losses?
27.	88963 (1,877)	Concern	3	114.UNGS	6. 114.114.DRIVERENGINE.P	49 U.S.C. 60108(a)	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?
28.	88963 (1,877)	Sat	3	114.UNGS	7. 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?
29.	88963 (1,877)	Sat	3	114.UNGS	8. 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?
30.	88963 (1,877)	Sat	3	114.UNGS	9. 114.114.LKRLSLKDATA.P	49 U.S.C. 60108(a)	Do procedures include a methodology to collect, retain and analyze detailed information from

Inspection Results Report (ALL Non-Empty Results) - Scp_PK 88963 (1,877)

Row	Assets	Result (Note ¹)	Sub-Group	Qst #	Question ID	References	Question Text
							detected natural gas leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?
31.	88963 (1,877)	Sat	3	114.UNGS	13. 114.114.TESTRELIEFVLV.P	49 U.S.C. 60108(a)	Do relief valve testing procedures include measures to minimize natural gas releases?
32.	88963 (1,877)	Sat	3	114.UNGS	14. 114.114.GNLDSGNCNFG.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?
33.	88963 (1,877)	Sat	3	114.UNGS	15. 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?
34.	88963 (1,877)	Sat	3	114.UNGS	16. 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?
35.	88963 (1,877)	NA	3	114.UNGS	17. 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?
36.	88963 (1,877)	NA	3	114.UNGS	18. 114.LEAKPRONE.LKMITGRPROTHER.P	49 U.S.C. 60108(a)	Do procedures clearly define a process to address replacement or remediation of pipe

Inspection Results Report (ALL Non-Empty Results) - Scp_PK 88963 (1,877)

Row	Assets	Result (Note ¹)	Sub-Group	Qst #	Question ID	References	Question Text
							segments with known leak issues beyond those specifically identified in Section 114?
37.	88963 (1,877)	NIC	3	114.GGBOOST	1. SRN.114.INSPECTCVRG.S		What are your assets comprised of?
38.	88963 (1,877)	NIC	3	114.GGBOOST	2. SRN.114.GASTRANSPORT.S		Do you transport natural gas as a specific commodity (i.e., not a byproduct or constituent of another substance)?
39.	88963 (1,877)	NIC	3	114.GGBOOST	3. SRN.114.DRIVERENGINE.S		Do you use natural gas-fueled drivers or engines to compress natural gas?
40.	88963 (1,877)	NIC	3	114.GGBOOST	4. SRN.114.NGUSE.S		Do you use natural gas for fuel or power appurtenances or instrument gas on regulated facilities?
41.	88963 (1,877)	Concern	3	114.GGBOOST	5. 114.114.COMPRESSOR.P	49 U.S.C. 60108(a)	Do the maintenance and operations procedures for compressors include provisions to minimize fugitive natural gas losses?
42.	88963 (1,877)	Concern	3	114.GGBOOST	6. 114.114.DRIVERENGINE.P	49 U.S.C. 60108(a)	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?
43.	88963 (1,877)	Sat	2	114.GGBOOST	7. 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?
44.	88963 (1,877)	Sat	3	114.GGBOOST	8. 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?

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Row	Assets	Result (Note ¹)	Sub-Group	Qst #	Question ID	References	Question Text
45.	88963 (1,877)	Sat	3	114.GGBOOST	9. 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?
46.	88963 (1,877)	Sat	3	114.GGBOOST	10. 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?
47.	88963 (1,877)	Concern	2	114.GGBOOST	11. 114.114.TESTESD.P	49 U.S.C. 60108(a)	Do procedures contain measures for ensuring ESD testing minimizes natural gas releases?
48.	88963 (1,877)	Sat	3	114.GGBOOST	12. 114.114.TESTRELIEFVLV.P	49 U.S.C. 60108(a)	Do relief valve testing procedures include measures to minimize natural gas releases?
49.	88963 (1,877)	Sat	2	114.GGBOOST	13. 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?
50.	88963 (1,877)	Sat	3	114.GGBOOST	14. 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?
51.	88963 (1,877)	Sat	2	114.GGBOOST	15. 114.114.GNLCMPSTATION.P	49 U.S.C. 60108(a)	Do procedures contain mechanisms for minimizing natural gas emissions from operations and maintenance activities within a compressor station (i.e., beyond compressor/driver-

Inspection Results Report (ALL Non-Empty Results) - Scp_PK 88963 (1,877)

Row	Assets	Result (Note ¹)	Sub-Group	Qst #	Question ID	References	Question Text
							specific procedures)?
52.	88963 (1,877)	Sat	3	114.GGBOOST	16. 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?
53.	88963 (1,877)	Sat	3	114.GGBOOST	17. 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?
54.	88963 (1,877)	NA	3	114.GGBOOST	18. 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?
55.	88963 (1,877)	NA	3	114.GGBOOST	19. 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.

Report Parameters: All non-empty Results

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