

Inspection Output (IOR)

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Report Filters

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

Results All

Inspection Information

Inspection Name	8780 Ferndale Gas Standard Inspection	Operator(s)	FERNDALE PIPELINE SYSTEM (570)	Plan Submitted	08/22/2024
Status	LOCKED	Lead	Derek Norwood	Plan Approval	08/26/2024 by Dennis Ritter
Start Year	2024	Observer(s)	David Cullom, Lex Vinsel, Anthony Dorrough, Scott Anderson, John Trier, Marina Rathbun, Tom Green, Jason Hoxit	All Activity Start	07/11/2024
System Type	GT	Supervisor	Dennis Ritter	All Activity End	07/25/2024
Protocol Set ID	WA.GT.2023.02	Director	Scott Rukke	Inspection Submitted	08/26/2024
				Inspection Approval	09/10/2024 by Scott Rukke

Inspection Summary

Inspection Scope and Summary

This was a standard inspection covering operations and maintenance for 2021-2023. Records reviewed remotely via Microsoft Teams and in-person at the Renton Control Center. There was one day of field inspection which included CP, electrical isolation, ROW patrol, markers, Valves, atmospheric corrosion and odorant testing.

Facilities visited and Total AFOD

4 AFODs

Inspected from Sumas Station to BP Cherry Point and Intalco

Summary of Significant Findings

(DO NOT Discuss Enforcement options)

There were no concerns or probable violations as a result of this inspection

Primary Operator contacts and/or participants

Jim Fraley, DOT Compliance Advisor

Jim Bruen, DOT Team Leader

Scope (Assets)

Short # Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1. 88968 (91)	Ferndale Pipeline System	unit	88968	Bottle/Pipe - Holders Vault Service Line Gas Storage Field (Aboveground) Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric Plastic Pipe	322	322	322	322	100.0%

Short # Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
				AMAOP Abandoned Compressor Stations					

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

Plans

Plan # Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1. 88968 (91)	2019 Gas Rule, Core, WUTC Standard Inspection	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, UNGS, 114, GENERIC	P, R, O, S	Detail	--
2. 88968 (91)	--	MO	P, R, O, S	Detail	--

Plan Implementations

# Activity Name	SMAR T Act#	Start Date End Date	Focus Directives	Involved Groups/Subgroups	Asset s	Qst Type(s)	Planned	Required	Inspected	Total	Required % Complete
1 Records and Procedures Review	--	07/11/2024 07/24/2024	--	all planned questions	all assets	P, R, S	269	269	269	100.0%	
2 Field Inspection	--	07/22/2024 07/25/2024	--	all planned questions	all assets	O	53	53	53	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	Records and Procedures Review	COMPLETED	08/22/2024	Records and Procedures Review	88968 (91)
2.	Attendance List	Field Inspection	COMPLETED	08/22/2024	Field Inspection	88968 (91)

Results (all values, 322 results)

358 (instead of 322) results are listed due to re-presentation of questions in more than one sub-group.

AR.IL: In-Line Inspection (Smart Pigs)

1. Question Result, ID, References NA, AR.IL.IINVALIDATE.R, 192.947 (192.921(a)(1), 192.493)

Question Text *Do records demonstrate that the operator has validated ILI assessment results per their process?*

Assets Covered 88968 (91)

Result Notes Not inspected at this time

Will be covered during TIMP inspection (ID 8781) in October 2024

AR.PTI: Integrity Assessment Via Pressure Test

2. Question Result, ID, References **NA, AR.PTI.PRESSTESTREVQUAL.R, 192.947(g) (192.915(a), 192.915(b))**
Question Text *Do records demonstrate that operator/vendor personnel, including supervisors, who conduct or review pressure test assessment results are qualified for the tasks they perform?*
Assets Covered **88968 (91)**
Result Notes **Not inspected at this time**

Will be covered during TIMP inspection (ID 8781) in October 2024
3. Question Result, ID, References **NA, AR.PTI.PRESSTESTRESULT.R, 192.517(a) (192.505(a), 192.505(b), 192.505(c), 192.505(d), 192.507(a), 192.507(b), 192.507(c), 192.513(a), 192.513(b), 192.513(c), 192.513(d), 192.517(b), 192.617, 192.619(a), 192.919(e), 192.921(a)(2))**
Question Text *Do the test records validate the pressure test?*
Assets Covered **88968 (91)**
Result Notes **Not inspected at this time**

Will be covered during TIMP inspection (ID 8781) in October 2024
4. Question Result, ID, References **NA, AR.PTI.PRESSTESTCOMPLETE.O, 192.503(a) (192.503(b), 192.503(c), 192.503(d), 192.505(a), 192.505(b), 192.505(c), 192.505(d), 192.507(a), 192.507(b), 192.507(c), 192.513(a), 192.513(b), 192.513(c), 192.513(d))**
Question Text *From field operations was the pressure test performed in accordance with Subpart J requirements and the process requirements?*
Assets Covered **88968 (91)**
Result Notes **No such activity/condition was observed during the inspection.**
5. Question Result, ID, References **NA, AR.PTI.SPIKEHYDRO.P, 192.506(a) (192.505, 192.710(c)(3), 192.921(a)(3))**
Question Text *Do the procedures for selecting pipeline assessment methods specifically include spike hydrotests as the assessment method for detecting time-dependent threats?*
Assets Covered **88968 (91)**
Result Notes **Not inspected at this time**

Will be covered during TIMP inspection (ID 8781) in October 2024
6. Question Result, ID, References **NA, AR.PTI.SPIKEHYDRO.R, 192.506(a) (192.505, 192.710(c)(3), 192.921(a)(3))**
Question Text *Where time-dependent threats were an identified risk, do the records indicate that a spike hydrotest was performed to "clear" any cracks that might otherwise grow during pressure reductions after the hydrostatic test?*
Assets Covered **88968 (91)**
Result Notes **Not inspected at this time**

Will be covered during TIMP inspection (ID 8781) in October 2024

AR.PFP: Predicted Failure Pressure

7. Question Result, ID, References **NA, AR.PFP.ANOMALYMETALLOSS.P, 192.712(b) (192.607, 192.712(a), 192.917(b), 192.933(d), 192.485,)**
Question Text *Do the procedures for evaluating corrosion metal loss anomalies or defects, ensure that a determination of the predicted failure pressure and the remaining life of the pipeline segment is established at the location of each anomaly or defect, in accordance with §192.712?*
Assets Covered **88968 (91)**
Result Notes **Not inspected at this time**

Will be covered during TIMP inspection (ID 8781) in October 2024
8. Question Result, ID, References **NA, AR.PFP.ANOMALYCRACKMODEL.P, 192.712(d)(1) (192.607, 192.712(a),)**

Question Text *Do the procedures for evaluating cracks and crack like defects ensure that a determination of the predicted failure pressure and the remaining life of the pipeline segment is established at the location of each anomaly or defect, in accordance with §192.712(d)(1)?*

Assets Covered 88968 (91)

Result Notes Not inspected at this time

Will be covered during TIMP inspection (ID 8781) in October 2024

9. Question Result, ID, References NA, AR.PFP.ANOMALYCRACKGROWTH.P, 192.712(d)(2) (192.607,)

Question Text *Do the procedures detail the performance of fatigue analysis and remaining life calculations for pipeline segments susceptible to cyclic fatigue or other loading conditions that could lead to fatigue crack growth?*

Assets Covered 88968 (91)

Result Notes Not inspected at this time

Will be covered during TIMP inspection (ID 8781) in October 2024

10. Question Result, ID, References NA, AR.PFP.ANOMALYCRACKSURVIVEPT.P, 192.712(d)(3) (192.607, 192.712(a), 192.712(d)(1))

Question Text *Do procedures call for the calculation of the largest potential crack defect sizes when analyzing potential cracks that could have survived a pressure test, specifically in the absence of any in-line inspection data in accordance with §192.712(d)(3)?*

Assets Covered 88968 (91)

Result Notes Not inspected at this time

Will be covered during TIMP inspection (ID 8781) in October 2024

11. Question Result, ID, References NA, AR.PFP.ANOMALYDATAUSE.P, 192.712(e) (192.607)

Question Text *Do the procedures detail the use of data when performing analyses of predicted or assumed anomalies or defects, in accordance with §192.712(e)?*

Assets Covered 88968 (91)

Result Notes Not inspected at this time

Will be covered during TIMP inspection (ID 8781) in October 2024

12. Question Result, ID, References NA, AR.PFP.ANOMALYRECORDS.P, 192.712(g) (192.607)

Question Text *Do procedures detail the collection, creation and retention of records including all investigations, analyses, and other actions taken in performing analyses of predicted or assumed anomalies or defects, in accordance with §192.712(g)?*

Assets Covered 88968 (91)

Result Notes Not inspected at this time

Will be covered during TIMP inspection (ID 8781) in October 2024

13. Question Result, ID, References NA, AR.PFP.ANOMALYRECORDS.R, 192.712(g) (192.712(e))

Question Text *Do the records capture all investigations, analyses and other actions taken to support the analysis of predicted failure pressure in accordance with §192.712(g)?*

Assets Covered 88968 (91)

Result Notes Not inspected at this time

Will be covered during TIMP inspection (ID 8781) in October 2024

AR.RC: Repair Criteria (HCA)

14. Question Result, ID, References NA, AR.RC.SCHEDULEIMPL.R, 192.947(f) (192.933(d))

Question Text *Do records demonstrate that defects in covered segments were remediated (i.e., repair, pressure reduction, or notification to PHMSA) within the applicable mandatory time limits of 192.933(d)?*

Assets Covered 88968 (91)
Result Notes Not inspected at this time

Will be covered during TIMP inspection (ID 8781) in October 2024

AR.RMP: Repair Methods and Practices

15. Question Result, ID, References NA, AR.RMP.IGNITION.O, 192.751(a) (192.751(b), 192.751(c))
Question Text *Perform observations of selected locations to verify that adequate steps have been taken by the operator to minimize the potential for accidental ignition.*
Assets Covered 88968 (91)
Result Notes No such activity/condition was observed during the inspection.

16. Question Result, ID, References NA, AR.RMP.METHOD.R, 192.709(a) (192.713(a), 192.713(b), 192.717(a), 192.717(b), ASME B31.8S-2004 Section 7)
Question Text *From the review of records, were all repairs performed in accordance with processes, applicable sections of Part 192, the guidance of ASME B31.8S-2004, Section 7, and the Pipeline Repair Manual, Revision 5?*
Assets Covered 88968 (91)
Result Notes Not inspected at this time

Will be covered during TIMP inspection (ID 8781) in October 2024

17. Question Result, ID, References NA, AR.RMP.REPAIRQUAL.R, 192.807(b) (192.805(h))
Question Text *From the review of selected records, were personnel performing repairs, other than welding, and post repair tests qualified for the task they performed?*
Assets Covered 88968 (91)
Result Notes Not inspected at this time

Will be covered during TIMP inspection (ID 8781) in October 2024

18. Question Result, ID, References NA, AR.RMP.REPLACESTD.R, 192.713(a) (Part 192 Subpart D)
Question Text *From the review of records, were any components that were replaced constructed to the same or higher standards as the original component?*
Assets Covered 88968 (91)
Result Notes Not inspected at this time

Will be covered during TIMP inspection (ID 8781) in October 2024

19. Question Result, ID, References NA, AR.RMP.WELDTTEST.O, 192.719(a) (192.719(b))
Question Text *Does the operator properly test replacement pipe and repairs made by welding on transmission lines?*
Assets Covered 88968 (91)
Result Notes No such activity/condition was observed during the inspection.

AR.PA: Pipeline Assessments for Non-IM Onshore Pipelines

20. Question Result, ID, References NA, AR.PA.ASSESSCHED.P, 192.710(b)(1) (192.710(b)(3))
Question Text *What is the process/plan (including the selection criteria, timeline, and use of prior assessments) for performing the initial assessments as required by §192.710(b)(1) and (b)(3)?*
Assets Covered 88968 (91)
Result Notes Not inspected at this time

Will be covered during TIMP inspection (ID 8781) in October 2024

21. Question Result, ID, References NA, AR.PA.ASSESSCHED.R, 192.710(b)(1) (192.710(b)(3))

Question Text *Do records demonstrate pipeline segments were initially assessed (and when) per §192.710(b)(1)?*

Assets Covered 88968 (91)

Result Notes Not inspected at this time

Will be covered during TIMP inspection (ID 8781) in October 2024

22. Question Result, ID, References NA, AR.PA.ASSESSMETHODS.P, 192.710(c)

Question Text *Do the procedures include a methodology for conducting the initial assessment of pipeline segments outside of an HCA per §192.710(c)?*

Assets Covered 88968 (91)

Result Notes Not inspected at this time

Will be covered during TIMP inspection (ID 8781) in October 2024

23. Question Result, ID, References NA, AR.PA.ASSESSMETHODS.R, 192.710(c)

Question Text *Do the records confirm the methodology used for conducting the initial assessment of pipeline segments outside of an HCA per §192.710(c) was selected based on the results of a risk-based prioritization?*

Assets Covered 88968 (91)

Result Notes Not inspected at this time

Will be covered during TIMP inspection (ID 8781) in October 2024

24. Question Result, ID, References NA, AR.PA.REASSESSMENTS.P, 192.710(b)(2) (192.710(b)(3), 192.939(a))

Question Text *Do the procedures require reassessments to be conducted at least once every 10 years, not to exceed 126 months, or a shorter interval based upon the nature and extent of anomalies discovered in the previous assessment as required by §192.710(b)(2)?*

Assets Covered 88968 (91)

Result Notes Not inspected at this time

Will be covered during TIMP inspection (ID 8781) in October 2024

25. Question Result, ID, References NA, AR.PA.REASSESSMENTS.R, 192.710(b)(2) (192.710(b)(3), 192.939(a))

Question Text *Do the records indicate adequate documentation of and rationale for the reassessment intervals?*

Assets Covered 88968 (91)

Result Notes Not inspected at this time

Will be covered during TIMP inspection (ID 8781) in October 2024

26. Question Result, ID, References NA, AR.PA.OTHERTECH.P, 192.710(c)(7) (192.18, 192.506(b))

Question Text *Where the operator has elected to use "Other Technology" (or other technical evaluation process) for assessing pipeline segments, does the process demonstrate an equivalent understanding of the condition of the line pipe for each of the threats to which the pipeline is susceptible?*

Assets Covered 88968 (91)

Result Notes Not inspected at this time

Will be covered during TIMP inspection (ID 8781) in October 2024

27. Question Result, ID, References NA, AR.PA.OTHERTECH.R, 192.710(c)(7) (192.18, 192.506(b))

Question Text *Where the operator has elected to use "Other Technology" (or other technical evaluation process) for assessing pipeline segments, do the records demonstrate an equivalent understanding of the condition of the line pipe for each of the threats to which the pipeline is susceptible?*

Assets Covered 88968 (91)

Result Notes Not inspected at this time

Will be covered during TIMP inspection (ID 8781) in October 2024

28. Question Result, ID, References **NA, AR.PA.REMEDIATIONCRITERIA.P, 192.710(f)**
 Question Text *Did the operator's procedures for anomaly investigation and remediation criteria for non-HCA pipeline segments meet the requirements of §§192.485, 192.711, and 192.713?*
 Assets Covered **88968 (91)**
 Result Notes **Not inspected at this time**
- Will be covered during TIMP inspection (ID 8781) in October 2024**
29. Question Result, ID, References **NA, AR.PA.REMEDIATIONCRITERIA.R, 192.710(f) (192.933, 192.709)**
 Question Text *Do the remediation records indicate that conducted remediation activities were conducted in accordance with the procedures?*
 Assets Covered **88968 (91)**
 Result Notes **Not inspected at this time**
- Will be covered during TIMP inspection (ID 8781) in October 2024**
30. Question Result, ID, References **NA, AR.PA.THREATID.P, 192.710**
 Question Text *Does the process include requirements to identify and evaluate all potential threats to each covered pipeline segment?*
 Assets Covered **88968 (91)**
 Result Notes **Not inspected at this time**
- Will be covered during TIMP inspection (ID 8781) in October 2024**
31. Question Result, ID, References **NA, AR.PA.THREATID.R, 192.710**
 Question Text *Do records demonstrate that all potential threats to each covered pipeline segment have been identified and evaluated?*
 Assets Covered **88968 (91)**
 Result Notes **Not inspected at this time**
- Will be covered during TIMP inspection (ID 8781) in October 2024**
32. Question Result, ID, References **NA, AR.PA.RAMETHOD.P, 192.710**
 Question Text *Does the process include requirements for a risk assessment and/or risk prioritization, that considers all of the identified threats for each assessable non-HCA pipeline segment?*
 Assets Covered **88968 (91)**
 Result Notes **Not inspected at this time**
- Will be covered during TIMP inspection (ID 8781) in October 2024**
33. Question Result, ID, References **NA, AR.PA.RAMETHOD.R, 192.710**
 Question Text *Do records demonstrate that the operator has performed a risk assessment on the non-HCA pipeline segments?*
 Assets Covered **88968 (91)**
 Result Notes **Not inspected at this time**
- Will be covered during TIMP inspection (ID 8781) in October 2024**
34. Question Result, ID, References **NA, AR.PA.RAFACTORS.P, 192.710**
 Question Text *Does the process include requirements for risk factors that could affect the likelihood of a release, and for factors that could affect the consequences of potential releases, be accounted for and combined in an appropriate manner to produce a risk value for each pipeline segment?*
 Assets Covered **88968 (91)**

Result Notes Not inspected at this time

Will be covered during TIMP inspection (ID 8781) in October 2024

35. Question Result, ID, References NA, AR.PA.RAFACTORS.R, 192.710

Question Text *Do records demonstrate that risk analysis data is combined in an appropriate manner to produce a risk value for each pipeline segment?*

Assets Covered 88968 (91)

Result Notes Not inspected at this time

Will be covered during TIMP inspection (ID 8781) in October 2024

DC.CO: Construction

36. Question Result, ID, References NA, DC.CO.CASING.R, 192.303 (192.323(a), 192.323(b), 192.323(c), 192.323(d), 192.467(a), 192.467(b))

Question Text *Do records indicate casings are installed in accordance with the requirements of WAC 480-93-115?*

Assets Covered 88968 (91)

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

37. Question Result, ID, References Sat, DC.CO.CASING.O, 192.323 (192.467(a), 192.467(b))

Question Text *Do field observations confirm railroad or highway casings are being installed as designed and specified, and in accordance with 192.323?*

Assets Covered 88968 (91)

Result Notes All casing inspected had casing vents, isolation was good

See attached Form R for details

38. Question Result, ID, References NA, DC.CO.REPAIR.R, 192.303 (192.309, 192.493)

Question Text *Do records demonstrate that repairs to steel pipe are being made in accordance with §192.309?*

Assets Covered 88968 (91)

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

DC.WELDINSPECTION: Construction Weld Inspection

39. Question Result, ID, References NA, DC.WELDINSPECTION.WELDVISUALQUAL.R, 192.241 (192.225, 192.227, 192.229, 192.231, 192.233, 192.243, 192.245)

Question Text *Does the operator have records showing that the welding was visually and/or non-destructively tested according to the requirements of 192.241 and the operator's specifications or procedures?*

Assets Covered 88968 (91)

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

40. Question Result, ID, References NA, DC.WELDINSPECTION.WELDNDT.R, 192.243

Question Text *Do records indicate that NDT and interpretation are in accordance with 192.243?*

Assets Covered 88968 (91)

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

41. Question Result, ID, References NA, DC.WELDINSPECTION.WELDREPAIR.R, 192.245 (192.303)

Question Text *Do records indicate that unacceptable welds are removed and/or repaired in accordance with 192.245?*

Assets Covered 88968 (91)

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

DC.WELDPROCEDURE: Construction Welding Procedures

42. Question Result, ID, References **NA, DC.WELDPROCEDURE.WELD.R, 192.225**
 Question Text *Does the operator have detailed records showing proper qualification of the welding procedures in accordance with 192.225?*
 Assets Covered **88968 (91)**
 Result Notes **No welding performed since last inspection**
43. Question Result, ID, References **NA, DC.WELDPROCEDURE.WELDERQUAL.R, 192.227 (192.225, 192.229)**
 Question Text *Do the records demonstrate that the welders are qualified in accordance with applicable sections of API Standard 1104 or ASME BPVC, Section IX, and cover the limitations in §192.229?*
 Assets Covered **88968 (91)**
 Result Notes **No welding performed since last inspection**
44. Question Result, ID, References **NA, DC.WELDPROCEDURE.WELDERQUAL.O, 192.227 (192.225, 192.229)**
 Question Text *Do field observations confirm that the welders are qualified in accordance with applicable sections of API Standard 1104 or ASME BPVC, Section IX, and cover the limitations in §192.229?*
 Assets Covered **88968 (91)**
 Result Notes **No such activity/condition was observed during the inspection.**

DC.DPCOPP: Design of Pipe - Overpressure Protection

45. Question Result, ID, References **NA, DC.DPCOPP.OVERPRESSURE.R, 192.195(a) (192.199(a), 192.199(b), 192.199(c), 192.199(d), 192.199(e), 192.199(f), 192.199(g), 192.199(h), 192.201(a), 192.201(b), 192.201(c))**
 Question Text *Do records indicate that the pipeline has pressure relieving or pressure limiting devices that are required by 192.195(a), and that they meet the requirements of 192.199 and 192.201?*
 Assets Covered **88968 (91)**
 Result Notes **No new overpressure protection**
46. Question Result, ID, References **NA, DC.DPCOPP.OVERPRESSURE.O, 192.195(a) (192.199(a), 192.199(b), 192.199(c), 192.199(d), 192.199(e), 192.199(f), 192.199(g), 192.199(h), 192.201(a), 192.201(b), 192.201(c))**
 Question Text *Are required pressure relieving or pressure limiting devices being installed, and do they meet the requirements of 192.199 and 192.201?*
 Assets Covered **88968 (91)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
- Ferndale gas has no OPP for their system that is owned/maintained by them**
47. Question Result, ID, References **NA, DC.DPCOPP.PRESSLIMIT.R, 192.199(a) (192.199(b), 192.199(c), 192.199(d), 192.199(e), 192.199(f), 192.199(g), 192.199(h))**
 Question Text *Do records indicate that pressure relieving or pressure limiting devices meet the requirements of 192.199?*
 Assets Covered **88968 (91)**
 Result Notes **No new overpressure protection**
48. Question Result, ID, References **NA, DC.DPCOPP.PRESSLIMIT.O, 192.199(a) (192.199(b), 192.199(c), 192.199(d), 192.199(e), 192.199(f), 192.199(g), 192.199(h))**
 Question Text *Do field observations confirm pressure relieving or pressure limiting devices meet the requirements of 192.199?*
 Assets Covered **88968 (91)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
- Ferndale gas has no OPP for their system that is owned/maintained by them**
49. Question Result, ID, References **NA, DC.DPCOPP.PRESSLIMITCAP.R, 192.201(a) (192.201(b), 192.201(c))**
 Question Text *Do records indicate that pressure relief or pressure limiting stations being installed comply with 192.201?*
 Assets Covered **88968 (91)**
 Result Notes **No new overpressure protection**

50. Question Result, ID, References **NA, DC.DPCOPP.PRESSLIMITCAP.O, 192.201(a) (192.201(b), 192.201(c))**
Question Text *Do field observations verify pressure relief or pressure limiting stations comply with the requirements of 192.201?*
Assets Covered **88968 (91)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

Ferndale gas has no OPP for their system that is owned/maintained by them

51. Question Result, ID, References **NA, DC.DPCOPP.MULTISTAGE.R,**
Question Text *Do records indicate that the operator is installing multistage regulator equipment consistent with the requirements in WAC 480-93-130?*
Assets Covered **88968 (91)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

DC.DPC: Design of Pipe Components

52. Question Result, ID, References **NA, DC.DPC.ILIPASS.R, 192.150 (192.150(a), 192.150(c), 192.493)**
Question Text *Do records indicate that certain transmission pipeline components are designed and constructed to accommodate the passage of instrumented internal inspection devices?*
Assets Covered **88968 (91)**
Result Notes **No new pipe or components installed since last inspection**

53. Question Result, ID, References **Sat, DC.DPC.VALVESPACE.R, 192.179(a) (192.179(a)(1), 192.179(a)(2), 192.179(a)(3), 192.179(a)(4), 192.179(b), 192.179(c), 192.179(d))**
Question Text *Do records indicate that transmission line valve spacing is in accordance with 192.179(a)?*
Assets Covered **88968 (91)**
Result Notes **No new installations but valves are currently spaced 5 miles apart**

This covers up to class 4

54. Question Result, ID, References **Sat, DC.DPC.VALVESPACE.O, 192.141 (192.179(a), 192.179(b), 192.179(c), 192.179(d))**
Question Text *Are transmission line valves being installed as required by §192.179?*
Assets Covered **88968 (91)**
Result Notes **Valves are space 5 miles apart**

55. Question Result, ID, References **NA, DC.DPC.INTCORRODE.R, 192.476(d) (192.476(b), 192.476(c), 192.476(a))**
Question Text *Do records demonstrate the transmission line project has features incorporated into its design and construction to reduce the risk of internal corrosion, as required of 192.476?*
Assets Covered **88968 (91)**
Result Notes **No new pipe or components installed since last inspection**

56. Question Result, ID, References **NA, DC.DPC.INTCORRODE.O, 192.476(a) (192.476(b), 192.476(c))**
Question Text *Does the transmission project's design and construction comply with 192.476?*
Assets Covered **88968 (91)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

57. Question Result, ID, References **NA, DC.DPC.CCPROTCOATLOWER.R, 192.143(b) (192.461(c)) (also presented in: DC.CO)**
Question Text *Do records indicate that each pipe segment with external protective coating was inspected just prior to lowering into the ditch and backfilling, and any damage detrimental to effective corrosion control was repaired?*
Assets Covered **88968 (91)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

58. Question Result, ID, References **NA, DC.DPC.CCELECTRICALISOL.R, 192.467(c) (192.143(b))**
Question Text *Do operator's records indicate that each pipeline was electrically isolated from metallic casings that are a part of the underground system?*
Assets Covered **88968 (91)**
Result Notes **No new casings installed**

Existing casing are checked for isolation annually

59. Question Result, ID, References **Sat, DC.DPC.CCELECTRICALISOL.O, 192.467(c) (192.143(b))**
Question Text *Do field observations confirm that each pipeline was electrically isolated from metallic casings that are a part of the underground system?*
Assets Covered **88968 (91)**
Result Notes **All casing inspected had casing vents, isolation was good**

See attached Form R for details

DC.MO: Maintenance and Operations

60. Question Result, ID, References **NA, DC.MO.ICEXAMINE.R, 192.491(c) (192.475(a), 192.475(b), 192.475(c))**
Question Text *Do records indicate examination of removed pipe for evidence of internal corrosion?*
Assets Covered **88968 (91)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

61. Question Result, ID, References **NA, DC.MO.ICEXAMINE.O, 192.475(a) (192.475(b), 192.475(c))**
Question Text *Is examination of removed pipe conducted to determine any evidence of internal corrosion?*
Assets Covered **88968 (91)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

62. Question Result, ID, References **NA, DC.MO.MAOPLIMIT.O, 192.605(b)(5)**
Question Text *During startup or shut-in, is it assured that the pressure limitations on the pipeline were not exceeded?*
Assets Covered **88968 (91)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

63. Question Result, ID, References **NA, DC.MO.RECORDUPDATE.R,**
Question Text *Do records indicate that records, maps, and drawings of gas facilities are updated not later than six months from completion of construction activity and made available to appropriate personnel?*
Assets Covered **88968 (91)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

DC.PT: Pressure Testing

64. Question Result, ID, References **NA, DC.PT.PRESSTEST.R, 192.503(a) (192.503(b), 192.503(c), 192.503(d), 192.503(e))** (also presented in: DC.PTLOWPRESS)
Question Text *Do records indicate that pressure testing is conducted in accordance with 192.503?*
Assets Covered **88968 (91)**
Result Notes **No new pressure tests have occurred since last inspection**

65. Question Result, ID, References **NA, DC.PT.PRESSTEST.O, 192.503(a) (192.503(b), 192.503(c), 192.503(d), 192.503(e))** (also presented in: DC.PTLOWPRESS)
Question Text *Is pressure testing conducted in accordance with 192.503?*
Assets Covered **88968 (91)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

66. Question Result, ID, [NA, DC.PT.PRESSTESTHIGHSTRESS.R, 192.505\(a\) \(192.143\(a\), 192.517\(a\), 192.505\(b\), 192.505\(c\), 192.505\(d\), 192.143\(b\), 192.143\(c\)\)](#)
 Question Text *Do records indicate that the sections of a pipeline operating at a hoop stress equal to or greater than 30% of SMYS were strength tested in accordance with the requirements of 192.505?*
 Assets Covered [88968 \(91\)](#)
 Result Notes [No new pressure tests have occurred since last inspection](#)
67. Question Result, ID, [NA, DC.PT.PRESSTESTHIGHSTRESS.O, 192.505\(a\) \(192.143\(a\), 192.505\(b\), 192.505\(c\), 192.505\(d\), 192.143\(b\), 192.143\(c\)\)](#)
 Question Text *Do field observations confirm that sections of a pipeline operating at a hoop stress equal to or greater than 30% of SMYS are strength tested in accordance with the requirements of 192.505?*
 Assets Covered [88968 \(91\)](#)
 Result Notes [No such event occurred, or condition existed, in the scope of inspection review.](#)
68. Question Result, ID, [Sat, DC.PT.PRESSTESTENVIRON.P, 192.515\(b\) \(192.629\(a\), 192.629\(b\)\)](#) (also presented in: DC.SPT, [DC.PTLOWPRESS](#))
 Question Text *Does the process require that, as applicable to the project, while conducting tests under Subpart J – Test Requirements, the test medium will be disposed of in a manner that will minimize damage to the environment?*
 Assets Covered [88968 \(91\)](#)
 Result Notes [Pressure Testing P192.501](#)
- [Section II Environmental Protection](#)
69. Question Result, ID, [NA, DC.PT.PRESSTESTENVIRON.R, 192.515\(b\) \(192.629\(a\), 192.629\(b\)\)](#) (also presented in: DC.SPT, [DC.PTLOWPRESS](#))
 Question Text *Do records indicate while conducting tests under Subpart J – Test Requirements, the test medium disposal was conducted in a manner that minimized damage to the environment?*
 Assets Covered [88968 \(91\)](#)
 Result Notes [No new pressure tests have occurred since last inspection](#)
70. Question Result, ID, [NA, DC.PT.PRESSTESTENVIRON.O, 192.515\(b\) \(192.629\(a\), 192.629\(b\)\)](#) (also presented in: DC.SPT, [DC.PTLOWPRESS](#))
 Question Text *Do field observations confirm while conducting tests under Subpart J – Test Requirements, the test medium was disposed of in an environmentally sound manner?*
 Assets Covered [88968 \(91\)](#)
 Result Notes [No such event occurred, or condition existed, in the scope of inspection review.](#)
71. Question Result, ID, [Sat, DC.PT.PRESSTESTSAFETY.P, 192.515\(a\) \(192.629\(a\), 192.629\(b\)\)](#) (also presented in: DC.SPT, [DC.PTLOWPRESS](#))
 Question Text *Does the process require that, as applicable to the project, while conducting tests under Subpart J – Test Requirements, every reasonable precaution is taken to protect its employees and the general public throughout the testing?*
 Assets Covered [88968 \(91\)](#)
 Result Notes [Pressure Testing P192.501](#)
- [Section II Environmental Protection](#)
72. Question Result, ID, [NA, DC.PT.PRESSTESTSAFETY.R, 192.515\(a\) \(192.629\(a\), 192.629\(b\)\)](#) (also presented in: DC.SPT, [DC.PTLOWPRESS](#))
 Question Text *Do records indicate while conducting tests under Subpart J – Test Requirements, every reasonable precaution was taken to protect its employees and the general public throughout the testing?*
 Assets Covered [88968 \(91\)](#)
 Result Notes [No new pressure tests have occurred since last inspection](#)
73. Question Result, ID, [NA, DC.PT.PRESSTESTSAFETY.O, 192.515\(a\) \(192.629\(a\), 192.629\(b\)\)](#) (also presented in: DC.SPT, [DC.PTLOWPRESS](#))
 Question Text *Do field observations confirm while conducting tests under Subpart J – Test Requirements, every reasonable precaution is taken to protect its employees and the general public throughout the testing?*
 Assets Covered [88968 \(91\)](#)
 Result Notes [No such event occurred, or condition existed, in the scope of inspection review.](#)

74. Question Result, ID, **Sat, DC.PT.PRESSTESTRECORD.P, 192.517(a) (192.517(b))** (also presented in: DC.SPT, References **DC.PTLOWPRESS**)
Question Text *Does the process require that, as applicable to the project, creation and retention of a record of each Subpart J test for the required duration?*
Assets Covered **88968 (91)**
Result Notes **Pressure Testing P192.501**

Section XIII Test Records

75. Question Result, ID, **NA, DC.PT.PRESSTESTRECORD.R, 192.517(a) (192.517(b))** (also presented in: DC.SPT, References **DC.PTLOWPRESS**)
Question Text *Do records indicate creation and retention of a record for each Subpart J test performed for the required duration?*
Assets Covered **88968 (91)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

76. Question Result, ID, References **NA, DC.PT.EQUIPMENTCALIBRATION.R,**
Question Text *Do records indicate that pressure testing equipment is maintained and calibrated at appropriate intervals in accordance with the manufacturer's recommendations?*
Assets Covered **88968 (91)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

DC.SPT: Spike Hydrotest

77. Question Result, ID, References **Sat, DC.SPT.SPIKEPRESSTEST.P, 192.605(b) (192.506)**
Question Text *Do the operator's procedures provide adequate instruction for conducting a Spike hydrotest, if applicable, according to the regulations?*
Assets Covered **88968 (91)**
Result Notes **Pressure Testing P192.501**

Section VIII Hydrotesting for Integrity Management

Part B cover Spike Test

78. Question Result, ID, References **NA, DC.SPT.SPIKEPRESSTEST.R, 192.709 (192.506, 192.517)**
Question Text *Do records indicate that spike pressure testing is/was conducted in accordance with §192.506?*
Assets Covered **88968 (91)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

79. Question Result, ID, References **NA, DC.SPT.SPIKEPRESSTEST.O, 192.506 (192.503)**
Question Text *Do field observations verify pressure testing is conducted in accordance with §192.506?*
Assets Covered **88968 (91)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

DC.PTLOWPRESS: Pressure Testing - Low Pressure

80. Question Result, ID, References **NA, DC.PTLOWPRESS.PRESSTESTLOWSTRESS.R, 192.507 (192.505, 192.515, 192.517, ANSI/GPTC Z380.1-2018 Appendix G-192-9)**
Question Text *Do records indicate that, as applicable to the project, sections of a pipeline operating at a hoop stress less than 30% of SMYS and at or above 100 psig were tested in accordance with the requirements of 192.507?*
Assets Covered **88968 (91)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

81. Question Result, ID, References **NA, DC.PTLOWPRESS.PRESSTESTLOWSTRESS.O, 192.507 (192.505, 192.515, ANSI/GPTC Z380.1-2018 Appendix G-192-9)**

Question Text *Do field observations confirm that sections of a pipeline operating at a hoop stress less than 30% of SMYS and at or above 100 psig are tested in accordance with the requirements of 192.507?*

Assets Covered 88968 (91)

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

82. Question Result, ID, References NA, DC.PTLOWPRESS.PRESSTEST100PSIG.R, 192.509 (192.143, 192.517)

Question Text *Do records indicate that the sections of a pipeline operated below 100 psig were leak tested in accordance with the section requirements of 192.509 (except for service lines and plastic pipelines)?*

Assets Covered 88968 (91)

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

83. Question Result, ID, References NA, DC.PTLOWPRESS.PRESSTEST100PSIG.O, 192.509 (192.143)

Question Text *Do field observations confirm that sections of a pipeline operated below 100 psig are leak tested in accordance with the requirements of 192.509 (except for service lines and plastic pipelines)?*

Assets Covered 88968 (91)

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

DC.TQ: Training and Qualification

84. Question Result, ID, References NA, DC.TQ.ABNORMAL.R, 192.807(a) (192.803)

Question Text *Do records show evaluation of qualified individuals for recognition and reaction to AOCs?*

Assets Covered 88968 (91)

Result Notes No design or construction performed during this inspection period

85. Question Result, ID, References NA, DC.TQ.OQCONTRACTOR.R, 192.807(a) (Operators OQ program manual)

Question Text *Are qualification records maintained for contractor personnel?*

Assets Covered 88968 (91)

Result Notes No design or construction performed during this inspection period

86. Question Result, ID, References NA, DC.TQ.RECORDS.R, 192.807(a) (Operators OQ program manual)

Question Text *Are qualification records maintained for operator personnel?*

Assets Covered 88968 (91)

Result Notes No design or construction performed during this inspection period

87. Question Result, ID, References NA, DC.TQ.EXCAVATE.R, 192.807(a) (ADB-2006-01)

Question Text *Do records demonstrate individuals who oversee marking, trenching and backfilling operations are qualified?*

Assets Covered 88968 (91)

Result Notes No design or construction performed during this inspection period

88. Question Result, ID, References NA, DC.TQ.HOTTAP.R, 192.807(a) (192.627)

Question Text *Do records document the qualification of personnel performing hot taps?*

Assets Covered 88968 (91)

Result Notes No design or construction performed during this inspection period

EP.ERG: Emergency Response

89. Question Result, ID, References Sat, EP.ERG.REVIEW.R, 192.605(a) (192.9(d), 192.9(e))

Question Text *Have annual reviews been conducted of the emergency plans and procedures as required, and any updates completed as appropriate?*

Assets Covered 88968 (91)

Result Notes NW District Emergency Response Plan

Reviewed and updated in 2021, 2022 and 2023

Sent to UTC when revised

90. Question Result, ID, References Sat, EP.ERG.LOCATION.O, 192.615(b)(1) (192.9(d), 192.9(e))
Question Text *Are supervisors provided the applicable portions of the emergency plan and procedures?*
Assets Covered 88968 (91)
Result Notes All personnel have access to emergency plans and procedures
91. Question Result, ID, References NA, EP.ERG.NOTICES.R, 192.615(a)(1) (192.9(d), 192.9(e))
Question Text *Do records indicate receiving, identifying, classifying and communication of notices of events requiring immediate response in accordance with procedures?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
92. Question Result, ID, References NA, EP.ERG.NOTIFY911.R, 192.615(a) (192.615(a)(8), 192.9(d), 192.9(e), NTSB P-11-9)
Question Text *Do records indicate that immediate and direct notification was made to 911 emergency call centers (or local emergency responder agency) for the communities and jurisdictions in which pipelines were located for situations when an emergency or possible rupture of a pipeline was indicated?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
93. Question Result, ID, References NA, EP.ERG.POSTEVTREVIEW.R, 192.605(a) (192.615(b)(1), 192.615(b)(3), 192.9(d), 192.9(e))
Question Text *Do records indicate review of employee activities to determine whether the procedures were effectively followed in each emergency?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
94. Question Result, ID, References Sat, EP.ERG.LIAISON.R, 192.603(b) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), 192.9(d), 192.9(e), ADB-2005-03) (also presented in: PD.PA)
Question Text *Do records indicate that liaison has been established and maintained with appropriate fire, police, other public officials, and 911 emergency call centers?*
Assets Covered 88968 (91)
Result Notes Pipeline Safety Awareness Training Provided by BP/Ferndale Gas

Reviewed records from 2021 (Virtual), 2022, 2023 (Skagit County and Whatcom county Commissioners, Fire, Police on attendance sheet)
95. Question Result, ID, References NA, EP.ERG.VALVESHUTOFF.R, 192.605(b) (192.636(b))
Question Text *Do the records demonstrate RMVs or AETs were shut-off in accordance with §192.636(b) following identification of a release?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
96. Question Result, ID, References NA, EP.ERG.NOTIFPOTRUPTURE.R, 192.635
Question Text *Do the records indicate the operator properly identified and notified operator's personnel of a potential rupture?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

EP.FII: Failure & Incident Investigation

97. Question Result, ID, References NA, EP.FII.INCIDENTANALYSIS.R, 192.617(d)

Question Text *Do records indicate pipeline incidents were analyzed to determine their causes?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

98. Question Result, ID, References NA, EP.FII.FAILUREANALYSIS.R, 192.617(d)

Question Text *Do records indicate pipeline failures were analyzed to determine their causes?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

IM.CA: Continual Evaluation and Assessment

99. Question Result, ID, References NA, IM.CA.REASSESSINTERVAL.R, 192.947(d) (192.937(a), 192.939(a), 192.939(b), 192.913(c))

Question Text *Do records demonstrate that reassessment intervals were established consistent with the requirements of the operator's processes?*
Assets Covered 88968 (91)
Result Notes Not inspected at this time

Will be covered during TIMP inspection (ID 8781) in October 2024

IM.PM: Preventive and Mitigative Measures

100. Question Result, ID, References NA, IM.PM.PMMGENERAL.R, 192.947 (192.935(a))

Question Text *Do records demonstrate that additional measures have been identified and implemented (or scheduled) beyond those already required by Part 192 to prevent a pipeline failure and to mitigate the consequences of a pipeline failure in an HCA?*
Assets Covered 88968 (91)
Result Notes Not inspected at this time

Will be covered during TIMP inspection (ID 8781) in October 2024

MO.GC: Conversion to Service

101. Question Result, ID, References NA, MO.GC.CONVERSION.P, 192.14(a) (192.14(b), 192.14(c))

Question Text *If any pipelines were converted into Part 192 service, was a process developed addressing all the applicable requirements?*
Assets Covered 88968 (91)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

102. Question Result, ID, References NA, MO.GC.CONVERSION.R, 192.14(a) (192.14(b), 192.14(c))

Question Text *Do records indicate the process was followed for converting any pipelines into Part 192 service?*
Assets Covered 88968 (91)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

MO.GOABNORMAL: Gas Pipeline Abnormal Operations

103. Question Result, ID, References Sat, MO.GOABNORMAL.ABNORMAL.P, 192.605(a) (192.605(c)(1))

Question Text *Does the process fully address the responsibilities during and after an abnormal operation?*
Assets Covered 88968 (91)
Result Notes Abnormal Operations Procedure P-192.605(c)

Section II Detection, Investigation and Response to Alarms

104. Question Result, ID, References **Sat, MO.GOABNORMAL.ABNORMAL.R, 192.605(a) (192.605(c)(1))**
 Question Text *Did personnel respond to indications of abnormal operations as required by the process?*
 Assets Covered **88968 (91)**
 Result Notes **Two abnormal operations during this inspection timeframe**
- High PSI at Sumas**
- Had to raise psi to do fip (facility inspection program) work**
- Gas Smell near FDGS MLV2**
- TCC received call from 3rd party about odor, tech completed visual inspection and soap test of MLV2**
105. Question Result, ID, References **Sat, MO.GOABNORMAL.ABNORMALCHECK.P, 192.605(a) (192.605(c)(2))**
 Question Text *Does the process include requirements for checking variations from normal operation after abnormal operation has ended at sufficient critical locations in the system to determine continued integrity and safe operation?*
 Assets Covered **88968 (91)**
 Result Notes **Abnormal Operations Procedure P-192.605(c)**
- Section VI Follow-Up Actions**
106. Question Result, ID, References **Sat, MO.GOABNORMAL.ABNORMALNOTIFY.P, 192.605(a) (192.605(c)(3))**
 Question Text *Does the process include requirements for notifying responsible operator personnel when notice of an abnormal operation is received?*
 Assets Covered **88968 (91)**
 Result Notes **Abnormal Operations Procedure P-192.605(c)**
- Section II Detection, Investigation and Response to Alarms**
107. Question Result, ID, References **Sat, MO.GOABNORMAL.ABNORMALREVIEW.P, 192.605(a) (192.605(c)(4))**
 Question Text *Does the process include requirements for periodically reviewing the response of operator personnel to determine the effectiveness of the processes controlling abnormal operation and taking corrective action where deficiencies are found?*
 Assets Covered **88968 (91)**
 Result Notes **Abnormal Operations Procedure P-192.605(c)**
- Section VII Procedures Effectiveness and Review**
108. Question Result, ID, References **Sat, MO.GOABNORMAL.ABNORMALREVIEW.R, 192.605(a) (192.605(c)(4))**
 Question Text *Do records indicate periodic review of work done by operator personnel to determine the effectiveness of the abnormal operation processes and corrective action taken where deficiencies are found?*
 Assets Covered **88968 (91)**
 Result Notes **1 review form completed during inspection interval**
- Ferndale Gas reviews sample of abnormal operations**
- Review found that employee performed tasks in accordance with procedures and procedures were effective**
- Abnormal Operations Review Form F192.605(c)(4)**

MO.GOCLASS: Gas Pipeline Class Location

109. Question Result, ID, [Sat, MO.GOCLASS.CLASSLOCATESTUDY.P, 192.605\(b\)\(1\) \(192.609\(a\), 192.609\(b\), 192.609\(c\), 192.609\(d\), 192.609\(e\), 192.609\(f\)\)](#)
 Question Text *Does the process include a requirement that the operator conduct a study whenever an increase in population density indicates a change in the class location of a pipeline segment operating at a hoop stress that is more than 40% SMYS, or indicates that the hoop stress corresponding to the established maximum allowable operating pressure for a segment of existing pipeline is not commensurate with the present class location?*
 Assets Covered [88968 \(91\)](#)
 Result Notes [Class Location Survey and Determination Procedure P-192.5](#)
- [Section III Continuing Surveillance of Class Location](#)
- [Annual or when population increase](#)
110. Question Result, ID, [NA, MO.GOCLASS.CLASSLOCATESTUDY.R, 192.605\(b\)\(1\) \(192.609\(a\), 192.609\(b\), 192.609\(c\), 192.609\(d\), 192.609\(e\), 192.609\(f\)\)](#)
 Question Text *Do records indicate performance of the required study whenever the population along a pipeline increased or there was an indication that the pipe hoop stress was not commensurate with the present class location?*
 Assets Covered [88968 \(91\)](#)
 Result Notes [No change in class location](#)
111. Question Result, ID, [Sat, MO.GOCLASS.CLASSLOCATEREV.P, 192.605\(b\)\(1\) \(192.609, 192.611\(a\), 192.611\(b\), 192.611\(c\), 192.611\(d\)\)](#)
 Question Text *Does the process include a requirement that the MAOP of a pipeline segment be confirmed or revised within 24 months whenever the hoop stress corresponding to the established MAOP is determined not to be commensurate with the existing class location?*
 Assets Covered [88968 \(91\)](#)
 Result Notes [Class Location Survey and Determination Procedure P-192.5](#)
- [Section III Continuing Surveillance of Class Location](#)
- [Change in Class Location Impact Study](#)
112. Question Result, ID, [NA, MO.GOCLASS.CLASSLOCATEREV.R, 192.605\(b\)\(1\) \(192.609, 192.611\(a\), 192.611\(b\), 192.611\(c\), 192.611\(d\)\)](#)
 Question Text *Was the MAOP in a pipeline segment confirmed or revised within 24 months as required?*
 Assets Covered [88968 \(91\)](#)
 Result Notes [No such event occurred, or condition existed, in the scope of inspection review.](#)
113. Question Result, ID, [NA, MO.GOCLASS.CLASSLOCATEREV.O, 192.611\(a\) \(192.609\)](#)
 Question Text *Do field observations verify that current population density and operator-determined class locations are consistent?*
 Assets Covered [88968 \(91\)](#)
 Result Notes [No such event occurred, or condition existed, in the scope of inspection review.](#)

MO.GOMAOP: Gas Pipeline MAOP

114. Question Result, ID, [Sat, MO.GOMAOP.MAOPDETERMINE.P, 192.605\(b\)\(1\) \(192.619\(a\), 192.619\(b\), 192.619\(c\), 192.619\(f\), 192.8\(b\), 192.8\(c\)\(4\), 192.9\(d\), 192.9\(e\)\(2\), 192.9\(f\)\(1\)\)](#)
 Question Text *Does the process include requirements for determining the maximum allowable operating pressure for a pipeline segment in accordance with §192.619?*
 Assets Covered [88968 \(91\)](#)
 Result Notes [Maximum Allowable Operating Pressure P192.619](#)
- [Section I MAOP Determination](#)
115. Question Result, ID, [Sat, MO.GOMAOP.MAOPLIMIT.P, 192.605\(a\) \(192.605\(b\)\(5\), 192.8\(b\), 192.8\(c\)\(4\), 192.9\(d\), 192.9\(e\)\(2\), 192.9\(f\)\(1\)\)](#)

Question Text *Does the process include requirements for starting up and shutting down any part of the pipeline in a manner to assure operation with the MAOP limits, plus the build-up allowed for operation of pressure-limiting and control devices?*

Assets Covered 88968 (91)

Result Notes Starting Up and Shutting Down the Pipeline P192.605(b)(5)

Section I, II, and III

116. Question Result, ID, Sat, MO.GOMAOP.MAOPDETERMINE.R, 192.709(c) (192.619(a), 192.619(b), 192.619(c), 192.619(f),
References 192.517, 192.8(b), 192.8(c)(4), 192.9(d), 192.9(e)(2), 192.9(f)(1))

Question Text *Do records indicate determination of the MAOP of pipeline segments in accordance with 192.619 and limiting of the operating pressure as required?*

Assets Covered 88968 (91)

Result Notes Ferndale completes an annual review to ensure no changes to the system and that MAOP is good

Reviewed records from 2023

117. Question Result, ID, Sat, MO.GOMAOP.MAOPLIMIT.R, 192.603(b) (192.605(b)(5), 192.619(a), 192.8(b), 192.8(c)(4),
References 192.9(d), 192.9(e)(2), 192.9(f)(1))

Question Text *Do records indicate operation within MAOP limits, plus the build-up allowed for operation of pressure-limiting and control devices, was assured while starting up and shutting down any part of the pipeline?*

Assets Covered 88968 (91)

Result Notes Reviewed daily high pressure logs for 2021-2023

High pressure fluctuates between ~550-650 psig

MO.GM: Gas Pipeline Maintenance

118. Question Result, ID, Sat, MO.GM.RECORDS.P, 192.605(b)(1) (192.709(a), 192.709(b), 192.709(c)) (also presented in:
References MO.GMOPP)

Question Text *Does the process include a requirement that the operator maintain a record of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test?*

Assets Covered 88968 (91)

Result Notes Maps & Records 192.605(b)(3)

Section I

119. Question Result, ID, Sat, MO.GM.RECORDS.R, 192.605(b)(1) (192.243(f), 192.709(a), 192.709(b), 192.709(c)) (also
References presented in: MO.GMOPP)

Question Text *Do records indicate that records are maintained of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test?*

Assets Covered 88968 (91)

Result Notes All records requested were available

120. Question Result, ID, Sat, MO.GM.IGNITION.P, 192.605(b)(1) (192.751(a), 192.751(b), 192.751(c))
References

Question Text *Are there processes for minimizing the danger of accidental ignition where gas constitutes a hazard of fire or explosion?*

Assets Covered 88968 (91)

Result Notes Prevention Against Ignitions P192.751

Description and Section I

121. Question Result, ID, Sat, MO.GM.IGNITION.R, 192.709 (192.751(a), 192.751(b), 192.751(c))
References

Question Text *Do records indicate personnel followed processes for minimizing the danger of accidental ignition where the presence of gas constituted a hazard of fire or explosion?*

Assets Covered 88968 (91)

Result Notes Reviewed a sample of Permit to Work Form

Form indicate if there is any hazard related to ignition of gas and mitigation techniques

122. Question Result, ID, References **Sat, MO.GM.IGNITION.O, 192.751(a) (192.751(b), 192.751(c))**
 Question Text *Are the operator's precautionary measures adequate on a gas transmission line where there exists the potential for accidental ignition?*
 Assets Covered **88968 (91)**
 Result Notes **Gas vented to a safe space when valves were operated**

Vehicles turned off at valve sites
123. Question Result, ID, References **Sat, MO.GM.VALVEINSPECT.P, 192.605(b)(1) (192.745(a), 192.745(b))**
 Question Text *Are there processes for inspecting and partially operating each transmission line valve that might be required in an emergency at intervals not exceeding 15 months, but at least once each calendar year and for taking prompt remedial action to correct any valve found inoperable?*
 Assets Covered **88968 (91)**
 Result Notes **Inspection of Mainline Valves P192.745**

Section II

Annually NTE 15 months
124. Question Result, ID, References **Sat, MO.GM.VALVEINSPECT.R, 192.709(c) (192.745(a), 192.745(b))**
 Question Text *Do records indicate proper inspection and partial operation of transmission line valves that may be required during an emergency as required and prompt remedial actions taken if necessary?*
 Assets Covered **88968 (91)**
 Result Notes **5 block valves on 16-inch line**

Inspected 2x per year

Reviewed records for 2021, 2022 and 2023

Launchers and receivers at Sumas, Cherry Point and Intalco are also inspected 2x per year

Would be used as emergency valves in some instances

Reviewed record for 2021-2023
125. Question Result, ID, References **Sat, MO.GM.VALVEINSPECT.O, 192.745(a) (192.745(b))**
 Question Text *Are field inspection and partial operation of transmission line valves adequate?*
 Assets Covered **88968 (91)**
 Result Notes **All valves appeared to be in good condition**

See Form R for details
126. Question Result, ID, References **Sat, MO.GM.TRAPSAFETY.P, 192.750 (192.605(b), 192.801, 192.805) (also presented in: DC.DPCOPP)**
 Question Text *Do the procedures require all launchers and receivers to have adequate safety devices in accordance with 192.750 and to ensure the safety devices are working properly just prior to each use?*
 Assets Covered **88968 (91)**
 Result Notes **Scraper & Sphere Facilities Procedure P-192.150**
127. Question Result, ID, References **NA, MO.GM.TRAPSAFETY.R, 192.750 (192.605(b), 192.801, 192.805) (also presented in: DC.DPCOPP)**
 Question Text *Does the operator have records to demonstrate whether all launchers and receivers have safety devices that were utilized prior to each use?*
 Assets Covered **88968 (91)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

128. Question Result, ID, References **Sat, MO.GM.TRAPSAFETY.O, 192.750 (192.605(b), 192.801, 192.805)** (also presented in: DC.DPCOPP)
Question Text *Do field observations confirm selected launchers and receivers have safety devices installed and whether the safety devices were inspected prior to each use?*
Assets Covered **88968 (91)**
Result Notes **Launchers and receivers are equipped with pressure relieving safety devices**

129. Question Result, ID, References **Sat, MO.GM.AETREQUIREMENT.P, 192.605(b) (192.745(d))**
Question Text *Do the procedures specify the requirements necessary to be achieved when operator installs an AET?*
Assets Covered **88968 (91)**
Result Notes **Mainline Valves P192.179**

Section V Rupture Mitigation Valve Capabilities

130. Question Result, ID, References **NA, MO.GM.AETREQUIREMENT.R, 192.709(c) (192.709(b), 192.745(d))**
Question Text *Do the records demonstrate that the operator complied with the requirements for AET response drills?*
Assets Covered **88968 (91)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

131. Question Result, ID, References **Sat, MO.GM.RMVREMEDIAL.P, 192.605(b) (192.179, 192.745(e))**
Question Text *Do the procedures adequately describe the remedial measures required for RMVs or AETs found inoperable or unable to maintain shut-off?*
Assets Covered **88968 (91)**
Result Notes **Inspection of Mainline Valves P192.745**

Section III Valve Inspection - RMVs Paragraph D

132. Question Result, ID, References **NA, MO.GM.RMVREMEDIAL.R, 192.709(b) (192.179, 192.745(e))**
Question Text *Do the records demonstrate the remedial measure requirements for RMVs or AETs were met?*
Assets Covered **88968 (91)**
Result Notes **No valves classified as RMVs or AETs**

133. Question Result, ID, References **Sat, MO.GM.ASVSHUTINPRESS.P, 192.605(b) (192.636(f), 192.745(f))**
Question Text *Do the procedures adequately describe the process for confirming ASV shut-in pressures?*
Assets Covered **88968 (91)**
Result Notes **Inspection of Mainline Valves P192.745**

Section III Valve Inspection - RMVs Paragraph B

134. Question Result, ID, References **NA, MO.GM.ASVSHUTINPRESS.R, 192.709(b) (192.636(f), 192.745(f))**
Question Text *Do the records demonstrate the process for confirming ASV shut-in pressures?*
Assets Covered **88968 (91)**
Result Notes **No ASVs in the system**

MO.GOODOR: Gas Pipeline Odorization

135. Question Result, ID, References **Sat, MO.GOODOR.ODORIZE.P, 192.605(b)(1) (192.625(a), 192.625(b), 192.625(c), 192.625(d), 192.625(e), 192.625(f))**
Question Text *Does the process ensure appropriate odorant levels are contained in its combustible gases in accordance with 192.625?*
Assets Covered **88968 (91)**
Result Notes **Odorization of Gas P192.625**

Section I

136. Question Result, ID, [Sat, MO.GOODOR.ODORIZE.R, 192.709\(c\)](#) ([192.625\(a\)](#), [192.625\(b\)](#), [192.625\(c\)](#), [192.625\(d\)](#),
References [192.625\(e\)](#), [192.625\(f\)](#))
Question Text *Do records indicate appropriate odorization of its combustible gases in accordance with its processes and conduct of the required testing to verify odorant levels met requirements?*
Assets Covered [88968 \(91\)](#)
Result Notes [Performed monthly](#)
- [Reviewed records for 2021-2023](#)
137. Question Result, ID, [Sat, MO.GOODOR.ODORIZE.O, 192.625\(f\)](#)
References
Question Text *Is sampling of combustible gases adequate using an instrument capable of determining the percentage of gas in air at which it becomes readily detectable?*
Assets Covered [88968 \(91\)](#)
Result Notes [Performed odorant sniff test at Intalco](#)
- [0.14% gas-in air readily detectable](#)

MO.GO: Gas Pipeline Operations

138. Question Result, ID, [Sat, MO.GO.CONTSURVEILLANCE.P, 192.605\(e\)](#) ([192.613\(a\)](#), [192.613\(b\)](#), [192.703\(b\)](#), [192.703\(c\)](#)) (also
References [presented in: MO.GOCLASS](#))
Question Text *Are there processes for performing continuing surveillance of pipeline facilities, and also for reconditioning, phasing out, or reducing the MAOP in a pipeline segment that is determined to be in unsatisfactory condition but on which no immediate hazard exists?*
Assets Covered [88968 \(91\)](#)
Result Notes [Continuing Surveillance Procedure P-192.613](#)
- [Section I Visual Facility Inspection](#)
- [Section II Extreme Weather](#)
139. Question Result, ID, [Sat, MO.GO.CONTSURVEILLANCE.R, 192.709\(c\)](#) ([192.613\(a\)](#), [192.613\(b\)](#), [192.703\(b\)](#), [192.703\(c\)](#)) (also
References [presented in: MO.GOCLASS](#))
Question Text *Do records indicate performance of continuing surveillance of facilities as required, and also the reconditioning, phasing out, or MAOP reduction in any pipeline segment that was determined to be in unsatisfactory condition but on which no immediate hazard existed?*
Assets Covered [88968 \(91\)](#)
Result Notes [Continuing Surveillance performed annually](#)
- [Record completed by field personnel](#)
- [Noted Migrant Housing for farm in 2021 but only for 2 month of the year so not identified site](#)
- [No comments or changes for 2022 and 2023](#)
140. Question Result, ID, [Sat, MO.GO.CONTSURVEILLANCE.O, 192.613\(a\)](#) ([192.613\(b\)](#), [192.703\(a\)](#), [192.703\(b\)](#), [192.703\(c\)](#)) (also
References [presented in: MO.GOCLASS](#))
Question Text *Are unsatisfactory conditions being captured and addressed by continuing surveillance of facilities and the pipeline as required by 192.613?*
Assets Covered [88968 \(91\)](#)
Result Notes [Ferndale performs continuing surveillance](#)
- [Class location and ROW conditions seem consistent with Ferndale's inspections](#)
141. Question Result, ID, [Sat, MO.GO.PURGE.P, 192.605\(b\)\(1\)](#) ([192.629\(a\)](#), [192.629\(b\)](#))
References
Question Text *Does the process include requirements for purging of pipelines in accordance with 192.629?*
Assets Covered [88968 \(91\)](#)

Section III.B

142. Question Result, ID, References Sat, MO.GO.OMANNUALREVIEW.P, 192.605(a)
Question Text *Does the process include a requirement to review the manual at intervals not exceeding 15 months, but at least once each calendar year?*
Assets Covered 88968 (91)
Result Notes Manual Review P192.605(a)

Section 1 Manual Review Process

143. Question Result, ID, References Sat, MO.GO.OMANNUALREVIEW.R, 192.605(a)
Question Text *Has the operator conducted annual reviews of the written procedures or processes in the manual as required?*
Assets Covered 88968 (91)
Result Notes OMER Book 1 Introduction

Reviewed annually NTE 15 months

Reviewed records for 2021, 2022 and 2023

144. Question Result, ID, References Sat, MO.GO.OMEFFECTREVIEW.P, 192.605(a) (192.605(b)(8))
Question Text *Does the process include requirements for periodically reviewing the work done by operator personnel to determine the effectiveness, and adequacy of the processes used in normal operations and maintenance and modifying the processes when deficiencies are found?*
Assets Covered 88968 (91)
Result Notes Review of Work Done by Operator P192.605(b)(8)

145. Question Result, ID, References Sat, MO.GO.OMEFFECTREVIEW.R, 192.605(a) (192.605(b)(8))
Question Text *Do records indicate periodic review of the work done by operator personnel to determine the effectiveness, and adequacy of the processes used in normal operations and maintenance and modifying the processes when deficiencies are found?*
Assets Covered 88968 (91)
Result Notes Evaluator Surveys completed in 2021, 2022 and 2023

Reviews process and work performed to determine procedure effectiveness

Review of Work Done by Operator P192.605(b)(8)

146. Question Result, ID, References Sat, MO.GO.OMHISTORY.P, 192.605(a) (192.605(b)(3))
Question Text *Does the process include requirements for making construction records, maps and operating history available to appropriate operating personnel?*
Assets Covered 88968 (91)
Result Notes Maps & Records P192.605(b)(3)

Section I

147. Question Result, ID, References Sat, MO.GO.OMHISTORY.R, 192.605(a) (192.605(b)(3))
Question Text *Are construction records, maps, and operating history available to appropriate operating personnel?*
Assets Covered 88968 (91)
Result Notes All personnel had access to record and maps

148. Question Result, ID, References Sat, MO.GO.OMHISTORY.O, 192.605(b)(3)
Question Text *Are construction records, maps and operating history available to appropriate operating personnel?*

Assets Covered 88968 (91)
Result Notes records, maps and procedures available to all personnel

149. Question Result, ID, References Sat, MO.GO.OMLOCATION.O, 192.605(a)
Question Text *Are appropriate parts of the manual kept at locations where operations and maintenance activities are conducted?*
Assets Covered 88968 (91)
Result Notes records, maps and procedures available to all personnel

Procedures available on company intranet site

150. Question Result, ID, References Sat, MO.GO.ODDOR.P, 192.605(a) (192.605(b)(11))
Question Text *Does the process require prompt response to the report of a gas odor inside or near a building?*
Assets Covered 88968 (91)
Result Notes Emergencies P192.605(e)

Section II.B.4

151. Question Result, ID, References Sat, MO.GO.UPRATE.P, 192.13(c) (192.553(a), 192.553(b), 192.553(c), 192.553(d))
Question Text *Is the pressure uprating process consistent with the requirements of 192.553?*
Assets Covered 88968 (91)
Result Notes Pipeline Uprating P192.553

Section I Uprating Requirements

Section II Washington State Requirements

152. Question Result, ID, References NA, MO.GO.UPRATE.R, 192.553(b) (192.553(a), 192.553(c), 192.553(d))
Question Text *Do records indicate the pressure uprating process was implemented per the requirements of 192.553?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

153. Question Result, ID, References Sat, MO.GO.CLASSCHNGVALVSPACE.P, 192.605(b) (192.610)
Question Text *Does the process include the installation of RMVs or AETs whenever pipe replacements occur due to a class location change?*
Assets Covered 88968 (91)
Result Notes Mainline Valves P192.179

Section III Change in Class Location

154. Question Result, ID, References NA, MO.GO.CLASSCHNGVALVSPACE.R, 192.709(c) (192.610)
Question Text *Do records indicate the installation of RMVs or AETs occurred whenever pipe replacements occurred due to a class location change?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

155. Question Result, ID, References NA, MO.GO.CLASSCHNGVALVSPACE.O, 192.709(c) (192.610)
Question Text *Do field observations verify RMVs or AETs were installed whenever pipe replacements occurred due to a class location change?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

MO.GMOPP: Gas Pipeline Overpressure Protection

156. Question Result, ID, References **Sat, MO.GMOPP.PRESSREGCAP.P, 192.605(b)(1) (192.743(a), 192.743(b), 192.743(c))**
Question Text *Does the process include procedures for ensuring that the capacity of each pressure relief device at pressure limiting stations and pressure regulating stations is sufficient?*
Assets Covered **88968 (91)**
Result Notes **Overpressure Safety Devices P192.739**

Section III.4

157. Question Result, ID, References **NA, MO.GMOPP.PRESSREGCAP.R, 192.709(c) (192.743(a), 192.743(b), 192.743(c))**
Question Text *Do records indicate testing or review of the capacity of each pressure relief device at each pressure limiting station and pressure regulating station as required?*
Assets Covered **88968 (91)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

Ferndale has no pressure reliefs for their system

158. Question Result, ID, References **Sat, MO.GMOPP.PRESSREGTEST.P, 192.605(b)(1) (192.739(a), 192.739(b))**
Question Text *Does the process include procedures for inspecting and testing each pressure limiting station, relief device, and pressure regulating station and their equipment?*
Assets Covered **88968 (91)**
Result Notes **Overpressure Safety Devices P192.739**

Section III Part C

159. Question Result, ID, References **Sat, MO.GMOPP.PRESSREGTEST.R, 192.709(c) (192.739(a), 192.739(b))**
Question Text *Do records indicate inspection and testing of pressure limiting, relief devices, and pressure regulating stations?*
Assets Covered **88968 (91)**
Result Notes **Reviewed pressure regulating and relief testing at Sumas, Cherry Point and Intalco**

Reviewed records for 2021, 2022 and 2023

160. Question Result, ID, References **NA, MO.GMOPP.PRESSREGTEST.O, 192.739(a) (192.739(b), 192.743)**
Question Text *Are field or bench tests or inspections of regulating stations, pressure limiting stations or relief devices adequate?*
Assets Covered **88968 (91)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

MO.RW: ROW Markers, Patrols, Leakage Survey and Monitoring

161. Question Result, ID, References **Sat, MO.RW.PATROL.P, 192.705(a) (192.705(b), 192.705(c))** (also presented in: PD.RW)
Question Text *Does the process adequately cover the requirements for patrolling the ROW and conditions reported?*
Assets Covered **88968 (91)**
Result Notes **Right-of-Way Inspections**

Procedure P#192.705

Section V

162. Question Result, ID, References **Sat, MO.RW.PATROL.R, 192.709(c) (192.705(a), 192.705(b), 192.705(c))** (also presented in: PD.RW)
Question Text *Do records indicate that ROW surface conditions have been patrolled as required?*
Assets Covered **88968 (91)**

Result Notes Reviewed Patrol records for 2021, 2022 and 2023

Performed weekly along with Crude and Butane lines

Procedure identifies DP information to be gathered and observed

163. Question Result, ID, Sat, MO.RW.ROWMARKER.O, 192.707(a) (192.707(b), 192.707(c), 192.707(d), 192.9(d), 192.9(e)) (also References presented in: PD.RW)

Question Text *Are line markers placed and maintained as required?*

Assets Covered 88968 (91)

Result Notes Markers were located as required, visible at all highway/railroad crossings and above ground locations

Markers in good condition with company information

164. Question Result, ID, Sat, MO.RW.ROWCONDITION.O, 192.705(a) (192.705(c)) (also presented in: PD.RW) References

Question Text *Are the ROW conditions acceptable for the type of patrolling used?*

Assets Covered 88968 (91)

Result Notes Patrolling performed by flying the line biweekly

Patrolled in conjunction with crude and butane line

165. Question Result, ID, Sat, MO.RW.ROWMARKER.P, 192.707(a) (192.707(b), 192.707(c), 192.707(d)) (also presented in: References PD.RW)

Question Text *Does the process adequately cover the requirements for placement of ROW markers?*

Assets Covered 88968 (91)

Result Notes Damage Prevention Program P192.614

Section XVI

USPL-GP 43-0119

Specification for Auxiliary Installations

Section 9 Pipeline Markers

ROW Inspections P192.705

Section VII.C

166. Question Result, ID, Sat, MO.RW.MARKERSURVEY.P, References

Question Text *Are procedures in place to survey pipeline markers at specified intervals?*

Assets Covered 88968 (91)

Result Notes ROW Inspections P192.705

Section VII

167. Question Result, ID, Sat, MO.RW.MARKERSURVEY.R, References

Question Text *Do records indicate that pipeline marker surveys were completed in the timeframe specified by WAC 480-93-124?*

Assets Covered 88968 (91)

Result Notes Marker Survey completed annually along with Leak Survey

Reviewed records for 2021, 2022 and 2023

168. Question Result, ID, Sat, MO.RW.LEAKAGE.P, 192.706 (192.706(a), 192.706(b), 192.935(d)) References

Question Text *Does the process require leakage surveys to be conducted?*

Assets Covered 88968 (91)
Result Notes Leakage Surveys P192.706

Section C

169. Question Result, ID, References Sat, MO.RW.LEAKAGE.R, 192.709(c) (192.706, 192.706(a), 192.706(b), 192.935(d), 192.703(c))

Question Text *Do records indicate leakage surveys conducted as required?*

Assets Covered 88968 (91)

Result Notes Performed annually NTE 15 months

03/2021, 3/31/22, 4/26/23

170. Question Result, ID, References NA, MO.RW.LEAKAGE.O, 192.706 (192.706(a), 192.706(b), 192.703(c))

Question Text *Are leakage surveys being implemented as required?*

Assets Covered 88968 (91)

Result Notes No such activity/condition was observed during the inspection.

171. Question Result, ID, References Sat, MO.RW.CASINGLEAKSURVEY.P,

Question Text *Does the process require shorted casings be leak surveyed as required?*

Assets Covered 88968 (91)

Result Notes Corrosion Control P192.453

Appendix A

Section F

172. Question Result, ID, References NA, MO.RW.CASINGLEAKSURVEY.R,

Question Text *Do records indicate shorted casings were leak surveyed as required?*

Assets Covered 88968 (91)

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

173. Question Result, ID, References Sat, MO.RW.SPECIALLEAKSURVEY.P,

Question Text *Is there a process to conduct special leak surveys as required by WAC 480-93-188?*

Assets Covered 88968 (91)

Result Notes Leakage Surveys P192.706

Section V

174. Question Result, ID, References NA, MO.RW.SPECIALLEAKSURVEY.R,

Question Text *Do records indicate that special leak surveys have been conducted as required by WAC 480-93-188?*

Assets Covered 88968 (91)

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

175. Question Result, ID, References NA, MO.RW.LEAKAGE30SMYS.P, 192.935(d) (192.935(b)(1)(i), 192.935(b)(1)(iii))

Question Text *For pipelines operating below 30% SMYS in a Class 3 or 4 locations, but not in an HCA, is there a process for performing leak surveys?*

Assets Covered 88968 (91)

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

176. Question Result, ID, References NA, MO.RW.LEAKAGE30SMYS.R, 192.935(d) (192.935(b)(1)(i), 192.935(b)(1)(iii))

Question Text *For pipelines operating below 30% SMYS in a Class 3 or 4 locations, but not in an HCA, do records indicate performance of leak surveys?*

Assets Covered 88968 (91)

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

177. Question Result, ID, References Sat, MO.RW.LEAKGRADE.P,
Question Text *Do procedures require grading/re-grading leaks and evaluating the concentration and extent of leakage?*
Assets Covered 88968 (91)
Result Notes Leakage Surveys P192.706

Section VI

178. Question Result, ID, References NA, MO.RW.LEAKGRADE.R,
Question Text *Do records indicate that the operator has graded leaks and determined the extent of each leak?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

179. Question Result, ID, References Sat, MO.RW.LEAKPERIMETER.P,
Question Text *Do procedures require checking the perimeter of a gas leak with a combustible gas indicator?*
Assets Covered 88968 (91)
Result Notes Leakage Surveys P192.706

Section VI

180. Question Result, ID, References Sat, MO.RW.LEAKFOLLOWUP.P,
Question Text *Do procedures require performing a follow-up inspection on all leak repairs with residual gas remaining in the ground not later than thirty days after the repair?*
Assets Covered 88968 (91)
Result Notes Leakage Surveys P192.706

Section VI

181. Question Result, ID, References NA, MO.RW.LEAKFOLLOWUP.R,
Question Text *Do records indicate that a follow-up inspection was performed not more than thirty days following a repair where residual gas remained in the ground?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

182. Question Result, ID, References NA, MO.RW.DOWNGRADELEAKREPAIR.R,
Question Text *Do records indicate that leaks that have been downgraded are repaired within twenty-one months?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

183. Question Result, ID, References NA, MO.RW.LEAKREPAIRTIME.R,
Question Text *Do records indicate that leaks were repaired and re-evaluated within the timeframes specified in WAC 480-93-18601?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

184. Question Result, ID, References Sat, MO.RW.LEAKRECORDS.P, (also presented in: PD.RW)
Question Text *Does the operator have procedures to prepare and maintain gas leak records containing all information required by WAC 480-93-178?*
Assets Covered 88968 (91)
Result Notes Leakage Surveys P192.706

Section VIII Documentation & Records

185. Question Result, ID, References **NA, MO.RW.LEAKRECORDS.R,**
 Question Text *Have gas leak records been prepared and maintained as required?*
 Assets Covered **88968 (91)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
186. Question Result, ID, References **Sat, MO.RW.LEAKCALIBRATE.P,**
 Question Text *Is there a process to maintain and calibrate gas detection instruments in accordance with the manufacturer's recommendations?*
 Assets Covered **88968 (91)**
 Result Notes **Leakage Surveys P192.706**

Section IV Gas Leak Detection Equipment

187. Question Result, ID, References **Sat, MO.RW.LEAKCALIBRATE.R,**
 Question Text *Do records indicate that gas detection equipment has been maintained and calibrated in accordance with the manufacturer's recommendations?*
 Assets Covered **88968 (91)**
 Result Notes **Portable Gas Detector Unit 1 and 2 calibrated monthly**
- Reviewed records for 2021-2023**

MO.MCA: Moderate Consequence Areas (MCA)

188. Question Result, ID, References **NA, MO.MCA.MCADEF.P, 192.624(a)(2) (192.710(a)(2), 192.3)**
 Question Text *Is the operator's MCA definition consistent with the §192.3 Definition?*
 Assets Covered **88968 (91)**
 Result Notes **Not inspected at this time**
- Will be covered during TIMP inspection (ID 8781) in October 2024**
189. Question Result, ID, References **NA, MO.MCA.MCAIDENTIF.P, 192.624(a)(2) (192.710(a)(2),)**
 Question Text *What is the methodology being used for identifying MCAs?*
 Assets Covered **88968 (91)**
 Result Notes **Not inspected at this time**
- Will be covered during TIMP inspection (ID 8781) in October 2024**
190. Question Result, ID, References **NA, MO.MCA.MCAIDENTIF.R, 192.624(a)(2) (192.710(a)(2),)**
 Question Text *Do the records demonstrate MCAs are properly identified and documented with the physical characteristics/attributes, operating conditions, and surrounding environmental conditions of the pipeline?*
 Assets Covered **88968 (91)**
 Result Notes **Not inspected at this time**
- Will be covered during TIMP inspection (ID 8781) in October 2024**
191. Question Result, ID, References **NA, MO.MCA.MCAIDENTIF.O, 192.624(a)(2) (192.710(a)(2),)**
 Question Text *Do field observations of select locations indicate MCAs in the field are consistent with operator's most recent documented MCAs?*
 Assets Covered **88968 (91)**
 Result Notes **Not inspected at this time**
- Will be covered during TIMP inspection (ID 8781) in October 2024**

192. Question Result, ID, References **NA, MO.MCA.MCAIDENTIFROAD.R, 192.3 (192.624, 192.712)**
 Question Text *Do records demonstrate the operator properly identified and applied "covered" roadways that could be affected by the PIR, and therefore considered a "pipeline with an MCA"?*
 Assets Covered **88968 (91)**
 Result Notes **Not inspected at this time**

 Will be covered during TIMP inspection (ID 8781) in October 2024
193. Question Result, ID, References **NA, MO.MCA.MCAPIR.P, 192.903 (192.3, 192.624(a)(2), 192.710)**
 Question Text *Is the process for calculating and applying potential impact radius (PIR) for establishment of Moderate Consequence Areas (MCAs) consistent with the requirements of 192.3 and 192.903?*
 Assets Covered **88968 (91)**
 Result Notes **Not inspected at this time**

 Will be covered during TIMP inspection (ID 8781) in October 2024
194. Question Result, ID, References **NA, MO.MCA.MCAPIR.R, 192.903 (192.3, 192.624(a)(2), 192.710)**
 Question Text *Do records demonstrate the application of potential impact radius (PIR) for establishment of Moderate Consequence Areas (MCAs) is consistent with the requirements of 192.3 and 192.903?*
 Assets Covered **88968 (91)**
 Result Notes **Not inspected at this time**

 Will be covered during TIMP inspection (ID 8781) in October 2024
195. Question Result, ID, References **NA, MO.MCA.MCANEW.P, 192.613(a) (192.624(a)(2), 192.903, 192.5(d), 192.3)**
 Question Text *Does the process include a requirement for periodic evaluation of new information that creates a new Moderate Consequence Area?*
 Assets Covered **88968 (91)**
 Result Notes **Not inspected at this time**

 Will be covered during TIMP inspection (ID 8781) in October 2024
196. Question Result, ID, References **NA, MO.MCA.MCANEW.R, 192.613(a) (192.624(a)(2), 192.903, 192.5(d), 192.3)**
 Question Text *Do records demonstrate new information that creates a new Moderate Consequence Area was periodically collected and evaluated?*
 Assets Covered **88968 (91)**
 Result Notes **Not inspected at this time**

 Will be covered during TIMP inspection (ID 8781) in October 2024
197. Question Result, ID, References **NA, MO.MCA.MAOPRECONFIRM.P, 192.624(a)(2) (192.632(a))**
 Question Text *What is the written procedure for identifying legacy (grandfathered) pipeline segments affecting MCAs which must have their MAOP reconfirmed?*
 Assets Covered **88968 (91)**
 Result Notes **Not inspected at this time**

 Will be covered during TIMP inspection (ID 8781) in October 2024
198. Question Result, ID, References **NA, MO.MCA.MAOPRECONFIRM.R, 192.624(d) (192.603(b), 192.605(b)(1), 192.624(a)(2), 192.632(a))**
 Question Text *Do the records adequately identify legacy (grandfathered) pipeline segments affecting MCAs which must have their MAOP reconfirmed?*
 Assets Covered **88968 (91)**
 Result Notes **Not inspected at this time**

MO.RECONFMATV: Verification of Materials Properties

199. Question Result, ID, References **Sat, MO.RECONFMATV.PROGRAM.P, 192.607 (192.613, 192.619, 192.624, 192.632, 192.712)**
Question Text *What is the process (or program) for determining and collecting material verification records for line pipe to meet the requirements of §§ 192.619(a)(4), 192.624, 192.607, and 192.712?*
Assets Covered **88968 (91)**
Result Notes **Verification of Pipeline Material Properties P192.607**
- Section III Verification of Material Properties and Attributes**
200. Question Result, ID, References **Sat, MO.RECONFMATV.PROGRAM.R, 192.607(b)**
Question Text *Does the line pipe material verification documentation (records) of material properties and attributes demonstrate compliance with §192.607(b)?*
Assets Covered **88968 (91)**
Result Notes **Reviewed Mill Test Reports for the 8-inch and 16-inch pipeline**
- Records from 1989**
201. Question Result, ID, References **Sat, MO.RECONFMATV.COMPONENTS.P, 192.607(f) (192.607, 192.624, 192.712)**
Question Text *Does the process (or program) include determining which mainline pipeline components other than line pipe are subject to the verification of material properties and attributes requirements of 192.607(f)?*
Assets Covered **88968 (91)**
Result Notes **Verification of Pipeline Material Properties P192.607**
- Section VI Components**
202. Question Result, ID, References **Sat, MO.RECONFMATV.COMPONENTS.R, 192.607(f)**
Question Text *Does the verification documentation (records) of material properties and attributes for mainline pipeline components other than line pipe demonstrate compliance with §192.607(f)?*
Assets Covered **88968 (91)**
Result Notes **Reviewed purchasing records and component installs**
- Records in Renton**
- BP is in the process of reviewing all records to ensure records are TVC**
203. Question Result, ID, References **Sat, MO.RECONFMATV.OPPORTUNISTIC.P, 192.607(c) (192.607, 192.624, 192.632, 192.712)**
Question Text *Do the procedures define when an open excavation requires material verification and when it does not? (i.e., what meets the criteria of an opportunistic dig?)*
Assets Covered **88968 (91)**
Result Notes **Verification of Pipeline Material Properties P192.607**
- Section III.A Verification of Material Properties and Attributes**
204. Question Result, ID, References **NA, MO.RECONFMATV.OPPORTUNISTIC.O, 192.607(c) (192.607, 192.624, 192.632, 192.712)**
Question Text *Do field observations indicate that the opportunistic digs and testing conducted in the field meet the requirements of the procedures?*
Assets Covered **88968 (91)**
Result Notes **No such activity/condition was observed during the inspection.**
205. Question Result, ID, References **Sat, MO.RECONFMATV.TESTMETHODS.P, 192.607(c) (192.607(d), 192.624, 192.712)**

Question Text *What type(s) of NDT or destructive testing methods (i.e., ILI, in situ testing, etc.) is/are included in the procedures?*

Assets Covered 88968 (91)

Result Notes Verification of Pipeline Material Properties P192.607

Section IV Special Requirements for Nondestructive Methods

206. Question Result, ID, References NA, MO.RECONFMATV.TESTMETHODS.R, 192.607(b)

Question Text *Do the records indicate the type(s) of NDT or destructive testing methods used to comply with the procedures?*

Assets Covered 88968 (91)

Result Notes Ferndale is not expecting the need to perform NDT on line pipe but they are still in the process of reviewing material record

207. Question Result, ID, References Sat, MO.RECONFMATV.POPULGROUPS.P, 192.607(e) (192.624, 192.607, 192.712)

Question Text *If the operator plans to establish population groups, does the method employed meet the requirements of 192.607(e)?*

Assets Covered 88968 (91)

Result Notes Verification of Pipeline Material Properties P192.607

Section V Sampling of Multiple Segments of Pipe

208. Question Result, ID, References NA, MO.RECONFMATV.POPULGROUPS.R, 192.607(e)

Question Text *Where the operator has established population groups, do the records support operator's approved methods and comply with 192.607(e)?*

Assets Covered 88968 (91)

Result Notes Ferndale does not anticipate the need to have population groups since the line is a single continuous line consisting of 8-inch or 16 inch pipe

MO.RECONF: MAOP Reconfirmation

209. Question Result, ID, References Sat, MO.RECONF.MAOPMETHODORIG.R, 192.619 (192.624(a))

Question Text *Do records demonstrate what method(s) from §192.619 were used to determine the pipeline original MAOP on a segment-by-segment basis?*

Assets Covered 88968 (91)

Result Notes Established via hydrotest in 1990 and material specifications

MAOP established in accordance with 192.619(a)(2)

210. Question Result, ID, References Sat, MO.RECONF.RECONFIRMAPPLIC.P, 192.624(a) (192.619(f))

Question Text *Do procedures indicate the pipeline segments for which MAOP reconfirmation is applicable and must be conducted as required by §192.624(a)?*

Assets Covered 88968 (91)

Result Notes MAOP Reconfirmation P192.624

Section I Applicability

MAOP established in accordance with 192.619(a)(2)

Approximately 2 miles in an HCA and 1 mile in Class 3

211. Question Result, ID, References Sat, MO.RECONF.RECONFIRMTIMING.P, 192.624(b) (192.18)

Question Text *Have the procedures been developed and implemented for pipeline segments determined to require MAOP reconfirmation, including timeline and complete dates, as required by §192.624(b)?*

Assets Covered 88968 (91)

Result Notes MAOP Reconfirmation P192.624

Section III Reconfirmation Completion Dates

212. Question Result, ID, References Sat, MO.RECONF.RECONFIRMTIMING.R, 192.624(b) (192.614(a))
Question Text *Do the records indicate that the operator is making adequate progress towards their implementation timeline / schedule as required by §192.624(b)?*
Assets Covered 88968 (91)
Result Notes Ferndale Gas is in the process of ensuring records are TVC

Not expecting to need to complete MAOP Reconfirmation

213. Question Result, ID, References Sat, MO.RECONF.RECONFIRMMETHODS.P, 192.624(c) (192.18, 192 Subpart J, 192.619(a)(2), 192.632)
Question Text *Are the procedures for conducting MAOP reconfirmation adequate for the methods used (or intended to be used) as required by §192.624(c)?*
Assets Covered 88968 (91)
Result Notes MAOP Reconfirmation P192.624

Section II Reconfirmation Plan

Plans in place for all Methods

214. Question Result, ID, References Sat, MO.RECONF.COMPONENTS.P, 192.624 (192.607(e), 192.607(f), 192.619)
Question Text *Do the MAOP reconfirmation methods for the applicable portions of the facilities (i.e., Compressor Stations, Meter & Regulating Stations) ensure that material properties are available to support the MAOP?*
Assets Covered 88968 (91)
Result Notes MAOP Reconfirmation P192.624

Section II Reconfirmation Plan

215. Question Result, ID, References NA, MO.RECONF.COMPONENTS.R, 192.624 (192.607(e), 192.607(f), 192.619)
Question Text *Do the records identify all non-line pipe components requiring MAOP reconfirmation (e.g., compressor and meter stations)?*
Assets Covered 88968 (91)
Result Notes Ferndale Gas has not identified any pipeline or components requiring MAOP reconfirmation

216. Question Result, ID, References Sat, MO.RECONF.RECONFIRMRECORDS.P, 192.624(b) (192.624(d), 192.619(f))
Question Text *Do the MAOP reconfirmation procedures require recordkeeping in accordance with §192.624(d) for the life of the pipeline?*
Assets Covered 88968 (91)
Result Notes MAOP Reconfirmation P192.624

Section IV Records

217. Question Result, ID, References NA, MO.RECONF.RECONFIRMRECORDS.R, 192.624(d) (192.517, 192.624(b), 192.619(f))
Question Text *Do the MAOP reconfirmation records meet the requirements of §192.624(d) and are they retained for the life of the pipeline?*
Assets Covered 88968 (91)
Result Notes Ferndale Gas has not identified any pipeline or components requiring MAOP reconfirmation

218. Question Result, ID, References NA, MO.RECONF.RECONFIRMATION.O, 192.624(c) (192.505, 192.506, 192.607)
Question Text *Do field observations of selected MAOP reconfirmation method(s) or related activities verify that the method employed conforms with the operator-established procedures?*
Assets Covered 88968 (91)

Result Notes No such activity/condition was observed during the inspection.

MO.RECONFM1: MAOP Reconfirmation - Method 1

219. Question Result, ID, References **Sat**, MO.RECONFM1.METHOD1.P, 192.624(c)(1) (192.18, 192 Subpart J, 192.619(c))
Question Text *Where the operator has elected Method 1 for the MAOP reconfirmation, do the procedures for conducting a pressure test for MAOP reconfirmation meet the requirements of §192.624(c)(1)?*
Assets Covered **88968 (91)**
Result Notes **MAOP Reconfirmation P192.624**

Section II Reconfirmation (Method 1)

220. Question Result, ID, References **NA**, MO.RECONFM1.METHOD1.R, 192.624(d) (192.624(c)(1), 192 Subpart J, 192.619(c))
Question Text *Where the operator has elected Method 1 for the MAOP reconfirmation, are the records adequate for a pressure test for MAOP reconfirmation as required by §192.624(c)(1)?*
Assets Covered **88968 (91)**
Result Notes **Ferndale Gas has not identified any pipeline or components requiring MAOP reconfirmation**

They are actively in the process of ensuring records are TVC

MO.RECONFM2: MAOP Reconfirmation - Method 2

221. Question Result, ID, References **Sat**, MO.RECONFM2.METHOD2.P, 192.624(c)(2) (192.18, 192 Subpart J, 192.619(c))
Question Text *Where the operator has elected Method 2 for the MAOP reconfirmation, do the procedures for conducting a pressure reduction for MAOP reconfirmation meet the requirements of §192.624(c)(2)?*
Assets Covered **88968 (91)**
Result Notes **MAOP Reconfirmation P192.624**

Section II Reconfirmation (Method 2)

222. Question Result, ID, References **NA**, MO.RECONFM2.METHOD2.R, 192.624(d) (192.624(c)(2), 192 Subpart J, 192.18, 192.619(c))
Question Text *Where the operator has elected Method 2 for the MAOP reconfirmation, do the records confirm the pressure reduction for MAOP reconfirmation meet the requirements of §192.624(c)(2)?*
Assets Covered **88968 (91)**
Result Notes **Ferndale Gas has not identified any pipeline or components requiring MAOP reconfirmation**

They are actively in the process of ensuring records are TVC

MO.RECONFM3: MAOP Reconfirmation - Method 3 (ECA)

223. Question Result, ID, References **Sat**, MO.RECONFM3.ECAASSESSMENT.P, 192.632
Question Text *When the operator elects to use ECA for MAOP reconfirmation (per §192.624(c)(3)), do the procedures provide sufficient detail to ensure the ECA Assessment is conducted in accordance with §192.632?*
Assets Covered **88968 (91)**
Result Notes **MAOP Reconfirmation P192.624**

Section II Reconfirmation (Method 3)

Procedure references 192.632 and does not have any detail at this point. If this method were used, Ferndale Gas would develop a specific process

224. Question Result, ID, References **Sat**, MO.RECONFM3.ECAANALYSIS1.P, 192.632(a) (192.624(c), 192.712)

Question Text *When the operator elects to use ECA for MAOP reconfirmation (per §192.624(c)(3)), do the procedures provide sufficient detail to ensure the ECA Analysis is conducted in accordance with §192.632(a) for methods and data collection?*

Assets Covered 88968 (91)

Result Notes MAOP Reconfirmation P192.624

Section II Reconfirmation (Method 3)

Procedure references 192.632 and does not have any detail at this point. If this method were used, Ferndale Gas would develop a specific process

225. Question Result, ID, References Sat, MO.RECONFM3.ECAANALYSIS2.P, 192.632(a) (192.624(c), 192.712)

Question Text *When the operator elects to use ECA for MAOP reconfirmation (per §192.624(c)(3)), do the procedures provide sufficient detail to ensure the ECA Analysis is conducted in accordance with §192.632(a) for crack analysis and predicted failure pressure (including Charpy V-notch)?*

Assets Covered 88968 (91)

Result Notes MAOP Reconfirmation P192.624

Section II Reconfirmation (Method 3)

Procedure references 192.632 and does not have any detail at this point. If this method were used, Ferndale Gas would develop a specific process

226. Question Result, ID, References Sat, MO.RECONFM3.ECAREMAINDEFECTS.P, 192.632(b) (192.624(c), 192.712)

Question Text *When the operator elects to use ECA for MAOP reconfirmation (per §192.624(c)(3)), do the procedures provide sufficient detail to ensure the ECA Assessment is conducted in accordance with §192.632(b) for determining remaining defects?*

Assets Covered 88968 (91)

Result Notes MAOP Reconfirmation P192.624

Section II Reconfirmation (Method 3)

Procedure references 192.632 and does not have any detail at this point. If this method were used, Ferndale Gas would develop a specific process

227. Question Result, ID, References Sat, MO.RECONFM3.ECAREMAINDEFECTSILI.P, 192.632(c) (192.624(c), 192.712)

Question Text *When the operator elects to use ECA for MAOP reconfirmation (per §192.624(c)(3)), do the procedures provide sufficient detail to ensure the ECA Analysis is conducted in accordance with §192.632(c) for selecting appropriate ILI tools?*

Assets Covered 88968 (91)

Result Notes MAOP Reconfirmation P192.624

Section II Reconfirmation (Method 3)

Procedure references 192.632 and does not have any detail at this point. If this method were used, Ferndale Gas would develop a specific process

228. Question Result, ID, References Sat, MO.RECONFM3.ECAREMAINPIPELINELIFE.P, 192.632(d) (192.624(c), 192.712)

Question Text *When the operator elects to use ECA for MAOP reconfirmation (per §192.624(c)(3)), do the procedures provide sufficient detail to ensure the ECA Analysis is performed in accordance with §192.632(d) for estimating remaining life of the pipeline?*

Assets Covered 88968 (91)

Result Notes MAOP Reconfirmation P192.624

Section II Reconfirmation (Method 3)

Procedure references 192.632 and does not have any detail at this point. If this method were used, Ferndale Gas would develop a specific process

229. Question Result, ID, References **NA, MO.RECONFM3.ECAASSESSMENT.R, 192.632**
 Question Text *When the operator elects to use ECA for MAOP reconfirmation (per §192.624(c)(3)), do the records indicate the ECA Analysis was conducted in accordance with their procedures and §192.632?*
 Assets Covered **88968 (91)**
 Result Notes **Ferndale Gas has not identified any pipeline or components requiring MAOP reconfirmation**

They are actively in the process of ensuring records are TVC
230. Question Result, ID, References **NA, MO.RECONFM3.ECAANALYSIS1.R, 192.632(a) (192.624(c), 192.712)**
 Question Text *When the operator elects to use ECA for MAOP reconfirmation (per §192.624(c)(3)), do the records indicate the ECA Analysis was conducted in accordance with §192.632(a) for methods and data collection?*
 Assets Covered **88968 (91)**
 Result Notes **Ferndale Gas has not identified any pipeline or components requiring MAOP reconfirmation**

They are actively in the process of ensuring records are TVC
231. Question Result, ID, References **NA, MO.RECONFM3.ECAANALYSIS2.R, 192.632(a) (192.624(c), 192.712)**
 Question Text *When the operator elects to use ECA for MAOP reconfirmation (per §192.624(c)(3)), do the records indicate the ECA Analysis was conducted in accordance with §192.632(a) for crack analysis and predicted failure pressure (including Charpy V-notch)?*
 Assets Covered **88968 (91)**
 Result Notes **Ferndale Gas has not identified any pipeline or components requiring MAOP reconfirmation**

They are actively in the process of ensuring records are TVC
232. Question Result, ID, References **NA, MO.RECONFM3.ECAREMAINDEFECTS.R, 192.632(b) (192.624(c), 192.712)**
 Question Text *When the operator elects to use ECA for MAOP reconfirmation (per §192.624(c)(3)), do the records indicate the ECA Assessment was conducted in accordance with §192.632(b) for determining remaining defects?*
 Assets Covered **88968 (91)**
 Result Notes **Ferndale Gas has not identified any pipeline or components requiring MAOP reconfirmation**

They are actively in the process of ensuring records are TVC
233. Question Result, ID, References **NA, MO.RECONFM3.ECAREMAINDEFECTSILI.R, 192.632(c) (192.624(c), 192.712)**
 Question Text *When the operator elects to use ECA for MAOP reconfirmation (per §192.624(c)(3)), do the records indicate the ECA Analysis was conducted in accordance with §192.632(c) for selecting appropriate ILI tools?*
 Assets Covered **88968 (91)**
 Result Notes **Ferndale Gas has not identified any pipeline or components requiring MAOP reconfirmation**

They are actively in the process of ensuring records are TVC
234. Question Result, ID, References **NA, MO.RECONFM3.ECAREMAINPIPELINELIFE.R, 192.632(d) (192.624(c), 192.712)**
 Question Text *When the operator elects to use ECA for MAOP reconfirmation (per §192.624(c)(3)), do the records indicate the ECA Analysis was performed in accordance with §192.632(d) for estimating remaining life of the pipeline?*
 Assets Covered **88968 (91)**
 Result Notes **Ferndale Gas has not identified any pipeline or components requiring MAOP reconfirmation**

They are actively in the process of ensuring records are TVC

MO.RECONFM5: MAOP Reconfirmation - Method 5

235. Question Result, ID, References **Sat, MO.RECONFM5.METHOD5.P, 192.624(c)(5) (192.18, 192 Subpart J, 192.619(c))**
Question Text *Where the operator has elected Method 5 for the MAOP reconfirmation, do the procedures for conducting a pressure reduction for pipeline segments with small PIR meet the requirements of §192.624(c)(5)?*
Assets Covered **88968 (91)**
Result Notes **MAOP Reconfirmation P192.624**

Section II Reconfirmation (Method 5)

236. Question Result, ID, References **NA, MO.RECONFM5.METHOD5.R, 192.624(d) (192.624(c)(5), 192.18, 192 Subpart J, 192.619(c))**
Question Text *Where the operator has elected Method 5 for the MAOP reconfirmation, are the records for pressure reduction on pipeline segments with a small PIR for MAOP reconfirmation adequate as required by §192.624(c)(5)?*
Assets Covered **88968 (91)**
Result Notes **Ferndale Gas has not identified any pipeline or components requiring MAOP reconfirmation**

They are actively in the process of ensuring records are TVC

MO.RECONFM6: MAOP Reconfirmation - Method 6

237. Question Result, ID, References **Sat, MO.RECONFM6.METHOD6.P, 192.624(c)(6) (192.18, 192 Subpart J, 192.619(c))**
Question Text *Where the operator has elected Method 6 for the MAOP reconfirmation, do the procedures for the alternative technical evaluation process meet the requirements of §192.624(c)(6)?*
Assets Covered **88968 (91)**
Result Notes **MAOP Reconfirmation P192.624**

Section II Reconfirmation (Method 6)

238. Question Result, ID, References **NA, MO.RECONFM6.METHOD6.R, 192.624(d) (192.624(c)(6), 192.18, 192.619(c),)**
Question Text *Where the operator has elected Method 6 for the MAOP reconfirmation, do the records for the alternative technical evaluation process meet the requirements of §192.624(c)(6)?*
Assets Covered **88968 (91)**
Result Notes **Ferndale Gas has not identified any pipeline or components requiring MAOP reconfirmation**

They are actively in the process of ensuring records are TVC

PD.DP: Damage Prevention

239. Question Result, ID, References **Sat, PD.DP.EXCAVATEMARK.R, 192.614(c)(5)**
Question Text *Do records indicate that marking proposed excavation sites was completed within two business days and in accordance with RCW 19.122?*
Assets Covered **88968 (91)**
Result Notes **Reviewed a sample of locate requests**

Ticket received 7/1/24 completed 7/3/24

Birch Bay Lynden Rd

Called in 4/8/21, completed 4/12/21

CNG working on Guide Meridian Rd

Ticket called in 3/31/2022, completed 4/1/22

Stein Rd

Called in 11/21/23, completed 11/22/23

No locates exceeding 2 business days

240. Question Result, ID, References Sat, PD.DP.ONECALL.O, 192.614(c)(3)

Question Text *Observe operator process a "One Call" ticket.*

Assets Covered 88968 (91)

Result Notes Observed operator process one-call tickets

Damage Prevention Manager receives tickets and directs them to appropriate personnel and monitors workload

241. Question Result, ID, References Sat, PD.DP.PDPROGRAM.R, 192.614(c)

Question Text *Does the damage prevention program meet minimum requirements specified in 192.614(c)?*

Assets Covered 88968 (91)

Result Notes Reviewed Damage Prevention Program #P-192.614(c) and Public Awareness Plan

242. Question Result, ID, References Sat, PD.DP.DPINFOGATHER.R, 192.947(b) (192.917(b), 192.935(b)(1)(ii))

Question Text *Do records demonstrate that critical damage prevention information is being gathered and recorded during pipeline patrols, leakage surveys, and integrity assessments?*

Assets Covered 88968 (91)

Result Notes Reviewed Patrol records for 2021, 2022 and 2023

Performed weekly along with Crude and Butane lines

Procedure identifies DP information to be gathered and observed

243. Question Result, ID, References NA, PD.DP.NOTICETOEXCAVATOR.R,

Question Text *Do records indicate that the operator provides the required information to excavators who damage pipeline facilities?*

Assets Covered 88968 (91)

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

244. Question Result, ID, References NA, PD.DP.COMMISSIONREPORT.R,

Question Text *Do records indicate the operator reports to the commission when the operator or its contractor observes or becomes aware of the activities described in WAC 480-93-200(9)?*

Assets Covered 88968 (91)

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

PD.PA: Public Awareness

245. Question Result, ID, References Sat, PD.PA.LANGUAGE.R, 192.616(g) (API RP 1162 Section 2.3.1)

Question Text *Were materials and messages developed and delivered in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?*

Assets Covered 88968 (91)

Result Notes Emergency responder, public officials only in English

Public, excavators provided in English and Spanish

PD.SP: Special Permits

246. Question Result, ID, References **NA, PD.SP.REPAIR.R, 190.341(d)(2)**
Question Text *If the operator operates a pipeline under a special permit, do records indicate that required repairs were performed?*
Assets Covered **88968 (91)**
Result Notes **No such requirement existed in the scope of inspection review.**

RPT.NR: Notices and Reporting

247. Question Result, ID, References **Sat, RPT.NR.CONTACTUPDATE.R,**
Question Text *Do records indicate that the operator submits updated name, address, and phone numbers of emergency contacts/responsible officials to the commission and appropriate officials of ALL municipalities in which the company has pipeline facilities?*
Assets Covered **88968 (91)**
Result Notes **Provided to UTC via NW Spill Response Plan updates**
248. Question Result, ID, References **Sat, RPT.NR.19218NOTIF.P, 192.18(c) (192.506(b), 192.607(e)(4), 192.607(e)(5), 192.624(c)(2)(iii), 192.624(c)(6), 192.632(b)(3), 192.710(c)(7), 192.712(d)(3)(iv), 192.712(e)(2)(i)(E), 192.921(a)(7), 192.937(c)(7), 191.1(a), 192.8(b)(2), 192.9(g), 192.9(h))**
Question Text *Do the procedures include provisions for each of the required types of notifications to PHMSA per §192.18?*
Assets Covered **88968 (91)**
Result Notes **OMER Book 1 Section 3**

Notification and Reporting Requirements

249. Question Result, ID, References **NA, RPT.NR.19218NOTIF.R, 192.18(c) (192.506(b), 192.607(e)(4), 192.607(e)(5), 192.624(c)(2)(iii), 192.624(c)(6), 192.632(b)(3), 192.710(c)(7), 192.712(d)(3)(iv), 192.712(e)(2)(i)(E), 192.921(a)(7), 192.937(c)(7), 191.1(a), 192.8(b)(2), 192.9(g), 192.9(h))**
Question Text *Do the records indicate proper and timely notifications to PHMSA for each notification type as required by §192.18(c)?*
Assets Covered **88968 (91)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
250. Question Result, ID, References **NA, RPT.NR.CONSTRUCTIONREPORT.R,**
Question Text *Do records indicate the operator has filed a proposed construction report for construction or replacement of any segment of gas transmission pipeline of at least 100 feet in length?*
Assets Covered **88968 (91)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
251. Question Result, ID, References **NA, RPT.NR.PRESSURETESTNOTIFY.R,**
Question Text *Do records indicate that the operator notified the commission 3 days prior to commencement of any pressure test of a gas pipeline that will have a MAOP that produces a hoop stress of twenty percent or more of the specified minimum yield strength?*
Assets Covered **88968 (91)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
252. Question Result, ID, References **NA, RPT.NR.PROXIMITYREQUEST.R,**
Question Text *Do records demonstrate that the operator is in compliance with the proximity consideration requirements in WAC 480-93-020?*
Assets Covered **88968 (91)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

RPT.RR: Regulatory Reporting (Traditional)

253. Question Result, ID, References **Sat, RPT.RR.ANNUALREPORT.R, 191.17(a) (191.1(a), 192.8(c)(3), 192.8(c)(4), 192.8)**

Question Text *Have complete and accurate Annual Reports utilizing the most recent form F 7 100.2-1 been submitted?*
Assets Covered 88968 (91)
Result Notes Submitted 3/5/24, 3/13/23 and 3/10/22

All data looks to be complete and accurate

254. Question Result, ID, References Sat, RPT.RR.CONSTRUCTIONDEFECTS.R,
Question Text *Do records indicate that the operator has submitted timely and complete reports of construction defects and material failures that resulted in leaks?*
Assets Covered 88968 (91)
Result Notes Reviewed records for 2021, 2022 and 2023

All submitted by March 15

255. Question Result, ID, References NA, RPT.RR.IMMEDREPORT.R, 191.5(a) (191.7(a), 191.1(a), 192.8(c)(3))
Question Text *Do records indicate immediate notifications of incidents were made in accordance with §191.5?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

256. Question Result, ID, References NA, RPT.RR.INCIDENTREPORT.R, 191.15(a) (192.624(a)(1), 192.624(a)(2), 191.1(a), 192.8(c)(3))
Question Text *Do records indicate reportable incidents were identified and reports were submitted to DOT on the most recent Form within the required timeframe?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

257. Question Result, ID, References NA, RPT.RR.INCIDENTREPORTSUPP.R, 191.15(d) (191.1(a), 192.8(c)(3))
Question Text *Do records indicate accurate supplemental incident reports were filed and within the required timeframe using the most recent Form?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

258. Question Result, ID, References NA, RPT.RR.FAILUREANALYSIS.R,
Question Text *Do records indicate that the operator submits failure analysis reports within 5 days of completion for incidents or hazardous conditions due to construction defects or material failures?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

259. Question Result, ID, References NA, RPT.RR.SRCR.R, 191.23(a) (191.23(b), 191.25(a), 191.25(b), 191.25(c), 191.1(a), 192.8(c)(3)),
Question Text *Do records indicate Safety-Related Condition Reports were filed as required?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

260. Question Result, ID, References Sat, RPT.RR.NPMSANNUAL.R, 191.29(a) (191.29(b))
Question Text *Do records indicate NPMS submissions were completed each year, on or before March 15, representing all in service, idle and retired assets as of December 31 of the previous year (excludes distribution lines and gathering lines) occurred, and that if no modifications occurred, an email was submitted stating that fact?*
Assets Covered 88968 (91)
Result Notes OSAVE confirmation on 2/1/24, 2/6/23 and 3/3/22

261. Question Result, ID, References Sat, RPT.RR.PIPELINEMAPPING.R,
Question Text *Do records indicate that accurate maps (or updates) are provided for pipelines operating over 250 PSIG to specifications developed by the commission and sufficient to meet the needs of first responders?*
Assets Covered 88968 (91)

Result Notes NPMS submissions and data has been provided in the past to the UTC

No changes since initial construction

262. Question Result, ID, References NA, RPT.RR.OPID.R, 191.22(a) (191.22(c), 191.22(d), 191.1(a), 192.8(c)(3))
Question Text *Do records indicate appropriate obtaining, and control of, Operator Identification Numbers (OPIDs), including changes in entity, acquisition/divestiture, and construction/update/uprate?*
Assets Covered 88968 (91)
Result Notes No changes, divestiture, construction, etc.
263. Question Result, ID, References NA, RPT.RR.DIRTREPORTS.R,
Question Text *Do records indicate that the operator has submitted reports of damage to the commission using the damage information reporting tool (DIRT) within 45 days?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

SRN.GENERAL: General Screening Questions

264. Question Result, ID, References NIC, SRN.GENERAL.PROCEDORG.S, N/A
Question Text *How are the procedures organized?*
Assets Covered 88968 (91)
Result Notes Organized through OMER program

updated annually

OMER Book 1 (All Pipelines)

OMER Book 2 specific to each
265. Question Result, ID, References NIC, SRN.GENERAL.RECORDLOCATE.S, N/A
Question Text *How are records organized and stored, and are there limitations to reviewing them?*
Assets Covered 88968 (91)
Result Notes Records stored and located in Maximo

Documents operational and tasks

HCA records stored on SharePoint

Should be no limitations, Ferndale gas get people that have access
266. Question Result, ID, References NA, SRN.GENERAL.ASSETCHANGE.S, N/A
Question Text *Describe the significant asset acquisitions, mergers, and divestitures in the last five years.*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
267. Question Result, ID, References NA, SRN.GENERAL.SYSTEMCHGS.S, N/A
Question Text *Have there been any significant changes in the pipeline system configuration in the last 5 years?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
268. Question Result, ID, References NA, SRN.GENERAL.GRANDFATHER.S, N/A
Question Text *Are there any facilities or components grandfathered under various code requirements? (Provide details)*
Assets Covered 88968 (91)

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

SRN.AR-PA: AR - Pipeline Assessments for Non-IM Onshore Pipelines

269. Question Result, ID, References NIC, SRN.AR-PA.ASSESSNONHCA.S, N/A

Question Text *What is the status of your program to assess transmission lines outside of an HCA?*

Assets Covered 88968 (91)

Result Notes Ferndale Gas consists of 16" from Sumas to Cherry Point Refinery

8" from refineries to aluminum

mostly non-hca

Integrity assessments via ILI and inspect entire line

Every 7 years

SRN.MO-GOCLASS: MO - Gas Pipeline Class Location

270. Question Result, ID, References NIC, SRN.MO-GOCLASS.CLASSLOCATEMAOPREV.S, N/A

Question Text *Has there been a class location change occur in the past 3 years that required a study and the subsequent confirmation or revision of the pipeline segment's MAOP?*

Assets Covered 88968 (91)

Result Notes Annual evaluation during patrolling but no significant class location change so no study has been performed

MAOP is set to a level so that if the class location did change the MAOP would stay the same

MAOP is 812 (16-inch), 974 (8-inch)

SRN.MO-RECONF: MO - MAOP Reconfirmation

271. Question Result, ID, References NIC, SRN.MO-RECONF.MAOPMETHODS.S, N/A

Question Text *Which MAOP Reconfirmation Methods do you plan to use or have used?*

Assets Covered 88968 (91)

Result Notes Ferndale Gas believes they have TVA records so do not foresee the need to reconfirm

SRN.MO-MCA: MO - Moderate Consequence Areas (MCA)

272. Question Result, ID, References NIC, SRN.MO-MCA.MCAIDENTIFY.S, N/A

Question Text *Has the operator completed their review and identification of Moderate Consequence Areas (MCAs)?*

Assets Covered 88968 (91)

Result Notes Yes

SRN.MO-GOMAOP: MO - Gas Pipeline MAOP

273. Question Result, ID, References NIC, SRN.MO-GOMAOP.MAOPDETERMINATION.S, N/A

Question Text *Does the operator have any pipelines where the MAOP was determined by §192.619(a)(2) or §192.619(c)?*

Assets Covered 88968 (91)

Result Notes Both segments of the pipeline established MAOP based on pressure test (192.619(a)(2))

TD.ATM: Atmospheric Corrosion

274. Question Result, ID, References Sat, TD.ATM.ATMCORRODE.R, 192.491(c) (192.479(a), 192.479(b), 192.479(c), 192.9(f)(1), 192.453)
Question Text *Do records document the protection of above ground pipe from atmospheric corrosion?*
Assets Covered 88968 (91)
Result Notes Atmospheric survey completed every 3 years NTE 39 months
- Reviewed records for 2021-2023
- Two areas repaired based on AC survey
- Will check coating condition in the field
275. Question Result, ID, References Sat, TD.ATM.ATMCORRODEINSP.R, 192.491(c) (192.481(a), 192.481(b), 192.481(c), 192.481(d), 192.9(f)(1), 192.453)
Question Text *Do records document inspection of aboveground pipe for atmospheric corrosion?*
Assets Covered 88968 (91)
Result Notes Atmospheric survey completed every 3 years NTE 39 months
- Reviewed records for 2021-2023
- Two areas repaired based on AC survey
276. Question Result, ID, References Sat, TD.ATM.ATMCORRODEINSP.O, 192.481(b) (192.481(c), 192.479(a), 192.479(b), 192.479(c), 192.481(d), 192.9(f)(1), 192.453, 192.491)
Question Text *Is pipe that is exposed to atmospheric corrosion protected?*
Assets Covered 88968 (91)
Result Notes All above ground locations looked to be in good condition and were well-coated

TD.CPMONITOR: External Corrosion - CP Monitoring

277. Question Result, ID, References Sat, TD.CPMONITOR.MONITORCRITERIA.R, 192.491(c) (192.463(a), 192.9(f)(1), 182.452, 192.453, 192.491)
Question Text *Do records document that the CP monitoring criteria used was acceptable?*
Assets Covered 88968 (91)
Result Notes -850 mV or 100mV shift criteria
- All reads met criteria
278. Question Result, ID, References Sat, TD.CPMONITOR.MONITORCRITERIA.O, 192.465(a) (192.463(a), 192.463(b), 192.463(c), Part 192, Appendix D)
Question Text *Are methods used for taking CP monitoring readings that allow for the application of appropriate CP monitoring criteria?*
Assets Covered 88968 (91)
Result Notes CP at all locations was adequate
- See Form R for details
279. Question Result, ID, References Sat, TD.CPMONITOR.TEST.R, 192.491(c) (192.465(a), 192.9(f)(1), 192.452, 192.453, 192.491)
Question Text *Do records adequately document cathodic protection monitoring tests have occurred as required?*
Assets Covered 88968 (91)
Result Notes Completed annually NTE 15 months
- Reviewed records for 2021, 2022 and 2023
- Completed April 2021, June 2022 and June 2023

280. Question Result, ID, References Sat, TD.CPMONITOR.CURRENTTEST.R, 192.491(c) (192.465(b), 192.9(f)(1), 192.452, 192.453, 192.491)
Question Text *Do records document details of electrical checks of sources of rectifiers or other impressed current sources?*
Assets Covered 88968 (91)
Result Notes Rectifiers inspected 6x per year NTE 2.5 months
- Some instances completed by Norton Corrosion based on workload
- Reviewed records for 2021-2023
281. Question Result, ID, References Sat, TD.CPMONITOR.CURRENTTEST.O, 192.465(b)
Question Text *Are impressed current sources properly maintained and are they functioning properly?*
Assets Covered 88968 (91)
Result Notes Inspected Rectifier R200
- See Form R for details
282. Question Result, ID, References Sat, TD.CPMONITOR.REVCURRENTTEST.R, 192.491(c) (192.465(c), 192.9(f)(1), 192.452, 192.453, 192.491)
Question Text *Do records document details of electrical checks interference bonds, diodes, and reverse current switches?*
Assets Covered 88968 (91)
Result Notes Two bonds on system
- One non-critical with CNG and one critical with other BP line
- Both are checked 6x per year NTE 2.5 months
- Reviewed records for 2021-2023
283. Question Result, ID, References Sat, TD.CPMONITOR.REVCURRENTTEST.O, 192.465(c)
Question Text *Are interference bonds, diodes, and reverse current switches properly maintained and are they functioning properly?*
Assets Covered 88968 (91)
Result Notes One critical and one non-critical bond inspected
- Both were in good condition and could be checked for current flow
- See Form R for details
284. Question Result, ID, References Sat, TD.CPMONITOR.DEFICIENCY.R, 192.491(c) (192.465(d), 192.9(f)(1), 192.452, 192.453, 192.491)
Question Text *Do records adequately document actions taken to correct any identified deficiencies in corrosion control?*
Assets Covered 88968 (91)
Result Notes One bad test lead replaced in 2023
- Atmospheric corrosion repairs as needed
285. Question Result, ID, References Sat, TD.CPMONITOR.TESTSTATION.R, 192.469 (192.9(f)(1), 192.452, 192.453, 192.491)
Question Text *Do records identify the location of test stations and show a sufficient number of test stations?*
Assets Covered 88968 (91)
Result Notes Reviewed test station mileage
- No concerns

286. Question Result, ID, [Sat, TD.CPMONITOR.TESTLEAD.R, 192.491\(c\) \(192.471\(a\), 192.471\(b\), 192.471\(c\), 192.9\(f\)\(1\),](#)
References [192.452, 192.453, 192.491](#))

Question Text *Do records document that pipelines with cathodic protection have electrical test leads installed in accordance with requirements of Subpart I?*

Assets Covered [88968 \(91\)](#)

Result Notes [Test lead installed on 11/13/23](#)

[Reviewed work package and contractor qualification](#)

287. Question Result, ID, [Sat, TD.CPMONITOR.INTFRCURRENT.R, 192.491\(c\) \(192.473\(a\), 192.9\(f\)\(1\), 192.452, 192.453,](#)
References [192.491](#))

Question Text *Do records document an effective program is in place to minimize detrimental effects of interference currents and that detrimental effects of interference currents from CP systems on other underground metallic structures are minimized?*

Assets Covered [88968 \(91\)](#)

Result Notes [AC reads taken during annual CP survey](#)

[No reads above 15 V AC](#)

288. Question Result, ID, [NA, TD.CPMONITOR.INTFRCURRENT.O, 192.473\(a\)](#)
References

Question Text *Are areas of potential stray current identified, and if found, the detrimental effects of stray currents minimized?*

Assets Covered [88968 \(91\)](#)

Result Notes [No such event occurred, or condition existed, in the scope of inspection review.](#)

TD.CP: External Corrosion - Cathodic Protection

289. Question Result, ID, [Sat, TD.CP.POST1971.R, 192.491\(c\) \(192.455\(a\), 192.457\(a\), 192.452\(a\), 192.452\(b\), 192.455\(f\),](#)
References [192.455\(g\), 192.9\(f\)\(1\), 192.452, 192.453, 192.491](#))

Question Text *Do records document that each buried or submerged pipeline installed after July 31, 1971, has been protected against external corrosion with a cathodic protection system within 1 year after completion of construction, conversion to service, or becoming jurisdictional onshore gathering?*

Assets Covered [88968 \(91\)](#)

Result Notes [8-inch and 16-inch are protected by CP](#)

290. Question Result, ID, [NA, TD.CP.PRE1971.O, 192.457\(b\)](#)
References

Question Text *Are bare or coated pipes in compressor, regulator or meter stations installed before August 1, 1971 (except for cast and ductile iron lines) cathodically protected in areas where active corrosion was found in accordance with Subpart I of Part 192?*

Assets Covered [88968 \(91\)](#)

Result Notes [No such event occurred, or condition existed, in the scope of inspection review.](#)

291. Question Result, ID, [NA, TD.CP.UNPROTECT.R, 192.491\(c\) \(192.465\(e\), 192.9\(f\)\(1\), 192.452, 192.453, 192.491\)](#)
References

Question Text *Do records adequately document the re-evaluation of non-cathodically protected buried pipelines for areas of active corrosion?*

Assets Covered [88968 \(91\)](#)

Result Notes [No such relevant facilities/equipment existed in the scope of inspection review.](#)

292. Question Result, ID, [Sat, TD.CP.ELECISOLATE.R, 192.491\(c\) \(192.467\(a\), 192.467\(b\), 192.467\(c\), 192.467\(d\), 192.467\(e\),](#)
References [192.9\(f\)\(1\), 192.452, 192.453, 192.491](#))

Question Text *Do records adequately document electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?*

Assets Covered [88968 \(91\)](#)

Result Notes [Isolation kit installed at Sumas station](#)

[Inspected during annual CP survey](#)

Reviewed records for 2021-2023

293. Question Result, ID, References Sat, TD.CP.ELECISOLATE.O, 192.467(a) (192.467(b), 192.467(c), 192.467(d), 192.467(e))
Question Text *Are measures performed to ensure electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?*
Assets Covered 88968 (91)
Result Notes Verified isolation for casing and isolation kit at Sumas Meter station

See Form R for details

294. Question Result, ID, References Sat, TD.CP.ELECISOLATETEST.R, 192.491(c) (192.467(d), 192.9(f)(1), 192.452, 192.453, 192.491)
Question Text *Do records adequately document the inspection and electrical testing performed to ensure that electrical isolation is adequate?*
Assets Covered 88968 (91)
Result Notes Isolation kit installed at Sumas station

Inspected during annual CP survey

Reviewed records for 2021-2023

295. Question Result, ID, References Sat, TD.CP.CASINGINSPECT.R,
Question Text *Do records indicate that annual casing inspections have been performed to ensure electrical isolation from the pipeline?*
Assets Covered 88968 (91)
Result Notes Completed annually NTE 15 months along with annual CP survey

No shorted casings

100 mV isolation criteria

296. Question Result, ID, References Sat, TD.CP.CASINGINSPECT.O,
Question Text *Are casings electrically isolated from the pipeline?*
Assets Covered 88968 (91)
Result Notes All casings inspected were isolated

See Form R for details

297. Question Result, ID, References Sat, TD.CP.RECORDS.R, 192.491(a) (192.491(b), 192.491(c), 192.9(f)(1), 192.452, 192.453) (also presented in: TD.CP.MONITOR, TD.CP.EXPOSED)
Question Text *Do records indicate the location of all corrosion control items listed in §192.491(a)?*
Assets Covered 88968 (91)
Result Notes All requested records were available and have been provided

TD.COAT: External Corrosion - Coatings

298. Question Result, ID, References NA, TD.COAT.NEWPIPE.R, 192.491(c) (192.455(a)(1), 192.461(a), 192.461(b), 192.483(a), 192.9(f)(1), 192.452, 192.453, 192.491)
Question Text *Do records document that each buried or submerged pipeline installed after July 31, 1971 has been externally coated with a suitable coating material?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

299. Question Result, ID, References NA, TD.COAT.NEWPIPEINSTALL.R, 192.491(c) (192.461(c), 192.461(d), 192.461(e), 192.483(a), 192.9(f)(1), 192.452, 192.453, 192.491)
Question Text *Do records document that acceptable external protective coating materials have been used and the application and inspection was done in accordance with the written procedures?*

Assets Covered 88968 (91)

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

TD.CPEXPOSED: External Corrosion - Exposed Pipe

300. Question Result, ID, References Sat, TD.CPEXPOSED.EXPOSEINSPECT.R, 192.491(c) (192.459, 192.9(f)(1), 192.452, 192.453, 192.491)
Question Text *Do records adequately document that exposed buried piping was examined for corrosion and deteriorated coating?*
Assets Covered 88968 (91)
Result Notes New test leads on 11/13/23 on 16-inch line

Pipe exposed and inspected

-1449 mV

No corrosion or coating defects
301. Question Result, ID, References NA, TD.CPEXPOSED.EXPOSEINSPECT.O, 192.459
Question Text *Is exposed buried piping examined for corrosion and deteriorated coating?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
302. Question Result, ID, References NA, TD.CPEXPOSED.EXTCORRODEEVAL.R, 192.491(c) (192.485(a), 192.485(b), 192.485(c), 192.9(f)(1), 192.452, 192.453, 192.491)
Question Text *Do records adequately document the evaluation of externally corroded pipe?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
303. Question Result, ID, References NA, TD.CPEXPOSED.EXTCORRODREPAIR.R, 192.491(c) (192.485(a), 192.485(b), 192.485(c), 192.9(f)(1), 192.452, 192.453, 192.491)
Question Text *Do records document the repair or replacement of pipe that has been externally corroded to an extent that there is not sufficient remaining pipe wall strength?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

TD.ICCG: Internal Corrosion - Corrosive Gas

304. Question Result, ID, References NA, TD.ICCG.CORRGAS.R, 192.491(c) (192.475(a), 192.9(f)(1), 192.452, 192.453, 192.491)
Question Text *Do the records demonstrate that the corrosive effect of the gas in the pipeline has been investigated and if determined to be corrosive, steps be taken to minimize internal corrosion?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

TD.ICP: Internal Corrosion - Preventive Measures

305. Question Result, ID, References NA, TD.ICP.EXAMINE.R, 192.491(c) (192.475(a), 192.475(b), 192.9(f)(1), 192.452, 192.453, 192.491)
Question Text *Do records document examination of removed pipe for evidence of internal corrosion?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
306. Question Result, ID, References NA, TD.ICP.EXAMINE.O, 192.475(a) (192.475(b))
Question Text *Is removed pipe examined for evidence of internal corrosion?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

307. Question Result, ID, References **NA, TD.ICP.EVALUATE.R, 192.491(c) (192.9(f)(1), 192.452, 192.453, 192.485(a), 192.485(c), 192.491)**
 Question Text *Do records document adequate evaluation of internally corroded pipe?*
 Assets Covered **88968 (91)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
308. Question Result, ID, References **NA, TD.ICP.REPAIRINT.R, 192.485(a) (192.485(b), 192.9(f)(1), 192.452, 192.453, 192.491)**
 Question Text *Do records document the repair or replacement of pipe that has been internally corroded to an extent that there is not sufficient remaining strength in the pipe wall?*
 Assets Covered **88968 (91)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

TQ.PROT9: OQ Protocol 9

309. Question Result, ID, References **NA, TQ.PROT9.CORRECTION.O, 192.801(a) (192.809(a))**
 Question Text *Have potential issues identified by the OQ plan inspection process been corrected at the operational level?*
 Assets Covered **88968 (91)**
 Result Notes **No OQ issues have been identified**
310. Question Result, ID, References **Sat, TQ.PROT9.TASKPERFORMANCE.O, 192.801(a) (192.809(a))**
 Question Text *Verify the qualified individuals performed the observed covered tasks in accordance with the operator's processes or operator approved contractor processes.*
 Assets Covered **88968 (91)**
 Result Notes **Verified OQs of Head Technician (E&M 1) and Field Technician (E&M EL2) prior to inspection**

No concerns
311. Question Result, ID, References **Sat, TQ.PROT9.QUALIFICATIONSTATUS.O, 192.801(a) (192.809(a))**
 Question Text *Verify the individuals performing the observed covered tasks are currently qualified to perform the covered tasks.*
 Assets Covered **88968 (91)**
 Result Notes **Verified OQs of Head Technician (E&M 1) and Field Technician (E&M EL2) prior to inspection**

No concerns
312. Question Result, ID, References **Sat, TQ.PROT9.AOCRECOG.O, 192.801(a) (192.809(a))**
 Question Text *Verify the individuals performing covered tasks are cognizant of the AOCs that are applicable to the tasks observed.*
 Assets Covered **88968 (91)**
 Result Notes **Personnel were cognizant of AOCs and knew how to respond in the event of an AOC**
313. Question Result, ID, References **Sat, TQ.PROT9.VERIFYQUAL.O, 192.801(a) (192.809(a))**
 Question Text *Observe in the field (job site, local office, etc.) that the foreman/supervisor/manager has verified the qualification of the individual performing the task, that the qualification records are current, and ensure the personal identification of all individuals performing covered tasks are checked, prior to task performance.*
 Assets Covered **88968 (91)**
 Result Notes **Verified OQs of Head Technician (E&M 1) and Field Technician (E&M EL2) prior to inspection**

No concerns

TQ.OQ: Operator Qualification

314. Question Result, ID, References Sat, TQ.OQ.OQCONTRACTOR.R, 192.807(a) (192.807(b))
Question Text *Are adequate records containing the required elements maintained for contractor personnel?*
Assets Covered 88968 (91)
Result Notes Zeph Larson

Northern Inspection Services

Performing rectifier reads in 2022

Qualified 3/31/21

Northern Inspection Services completed inspection on test lead installation

OQs verified prior to work for BP Tasks 1.1, 2.1, 2.4, 7.7, 8.2, 5.1-5.3

Hanging H performed excavation, backfill, test lead install

OQs verified prior to work

315. Question Result, ID, References Sat, TQ.OQ.RECORDS.R, 192.807
Question Text *Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified?*
Assets Covered 88968 (91)
Result Notes Reviewed records from 2021-2023 for two personnel

Head Technician (E&M 1) and Field Technician (E&M EL2)

Only two personnel performing covered tasks on Ferndale Gas

316. Question Result, ID, References Sat, TQ.OQ.TRAINING.R, 192.807(a) (192.807(b))
Question Text *Does the operator have records for initial qualification, re-training and re-evaluation of individuals performing covered tasks?*
Assets Covered 88968 (91)
Result Notes Reviewed records from 2021-2023 for two personnel

Head Technician (E&M 1) and Field Technician (E&M EL2)

Only two personnel performing covered tasks on Ferndale Gas

No contractors

317. Question Result, ID, References Sat, TQ.OQ.ABNORMAL.R, 192.807(a) (192.807(b), 192.803)
Question Text *Do records document evaluation of qualified individuals for recognition and reaction to AOCs?*
Assets Covered 88968 (91)
Result Notes Each task has AOCs identified and individuals are tested for knowledge of AOCs and response

Reviewed locating OQ task and verified AOCs and response were sufficient

TQ.QU: Qualification of Personnel - Specific Requirements

318. Question Result, ID, References Sat, TQ.QU.CORROSION.R, 192.453 (192.807(a), 192.807(b))
Question Text *Do records indicate qualification of personnel implementing pipeline corrosion control methods?*
Assets Covered 88968 (91)

Result Notes Brian Stone - NACE CP2 - Exp. 9/30/25; NACE Coating Inspector Exp. 12/31/25; NACE Corrosion Technologist 9/30/25

Corrosion Specialist OQs reviewed for 2021-2023

319. Question Result, ID, References Sat, TQ.QU.EXCAVATE.R, 192.807(a) (192.807(b), ADB-2006-01, 192.801, 192.328)
Question Text *Do records indicate qualification of individuals who oversee marking, trenching, and backfilling operations?*
Assets Covered 88968 (91)
Result Notes Reviewed records from 2021-2023 for two personnel

Head Technician (E&M 1) and Field Technician (E&M EL2)

Only two personnel performing covered tasks on Ferndale Gas

No contractors

TQ.QUOMCONST: Qualification of Personnel - Specific Requirements (O and M Construction)

320. Question Result, ID, References NA, TQ.QUOMCONST.NDT.R, 192.243(b)(2) (192.807(a), 192.807(b), 192.328(a), 192.328(b))
Question Text *Do records indicate the qualification of nondestructive testing personnel?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
321. Question Result, ID, References NA, TQ.QUOMCONST.WELDER.R, 192.227(a) (192.227(b), 192.229(a), 192.229(b), 192.229(c), 192.229(d), 192.328(a), 192.328(b), 192.807(a), 192.807(b))
Question Text *Do records indicate that welders are adequately qualified?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

TQ.TR: Training of Personnel

322. Question Result, ID, References Sat, TQ.TR.TRAINING.R, 192.615(b)(2) (192.807(a), 192.807(b))
Question Text *Is training for emergency response personnel documented?*
Assets Covered 88968 (91)
Result Notes Reviewed records from 2021-2023 for two personnel

Head Technician (E&M 1) and Field Technician (E&M EL2)

Both individuals complete annual HAZWOPER refresher training

DC.CO: Construction

323. Question Result, ID, References NA, DC.DPC.CCPROTCOATLOWER.R, 192.143(b) (192.461(c)) (also presented in: DC.DPC)
Question Text *Do records indicate that each pipe segment with external protective coating was inspected just prior to lowering into the ditch and backfilling, and any damage detrimental to effective corrosion control was repaired?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

DC.DPCOPP: Design of Pipe - Overpressure Protection

324. Question Result, ID, References **Sat, MO.GM.TRAPSAFETY.P, 192.750 (192.605(b), 192.801, 192.805)** (also presented in: MO.GM)
 Question Text *Do the procedures require all launchers and receivers to have adequate safety devices in accordance with 192.750 and to ensure the safety devices are working properly just prior to each use?*
 Assets Covered **88968 (91)**
 Result Notes **Scraper & Sphere Facilities Procedure P-192.150**
325. Question Result, ID, References **NA, MO.GM.TRAPSAFETY.R, 192.750 (192.605(b), 192.801, 192.805)** (also presented in: MO.GM)
 Question Text *Does the operator have records to demonstrate whether all launchers and receivers have safety devices that were utilized prior to each use?*
 Assets Covered **88968 (91)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
326. Question Result, ID, References **Sat, MO.GM.TRAPSAFETY.O, 192.750 (192.605(b), 192.801, 192.805)** (also presented in: MO.GM)
 Question Text *Do field observations confirm selected launchers and receivers have safety devices installed and whether the safety devices were inspected prior to each use?*
 Assets Covered **88968 (91)**
 Result Notes **Launchers and receivers are equipped with pressure relieving safety devices**

DC.SPT: Spike Hydrotest

327. Question Result, ID, References **Sat, DC.PT.PRESSTESTENVIRON.P, 192.515(b) (192.629(a), 192.629(b))** (also presented in: DC.PT, DC.PTLOWPRESS)
 Question Text *Does the process require that, as applicable to the project, while conducting tests under Subpart J – Test Requirements, the test medium will be disposed of in a manner that will minimize damage to the environment?*
 Assets Covered **88968 (91)**
 Result Notes **Pressure Testing P192.501**
- Section II Environmental Protection**
328. Question Result, ID, References **NA, DC.PT.PRESSTESTENVIRON.R, 192.515(b) (192.629(a), 192.629(b))** (also presented in: DC.PT, DC.PTLOWPRESS)
 Question Text *Do records indicate while conducting tests under Subpart J – Test Requirements, the test medium disposal was conducted in a manner that minimized damage to the environment?*
 Assets Covered **88968 (91)**
 Result Notes **No new pressure tests have occurred since last inspection**
329. Question Result, ID, References **NA, DC.PT.PRESSTESTENVIRON.O, 192.515(b) (192.629(a), 192.629(b))** (also presented in: DC.PT, DC.PTLOWPRESS)
 Question Text *Do field observations confirm while conducting tests under Subpart J – Test Requirements, the test medium was disposed of in an environmentally sound manner?*
 Assets Covered **88968 (91)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
330. Question Result, ID, References **Sat, DC.PT.PRESSTESTSAFETY.P, 192.515(a) (192.629(a), 192.629(b))** (also presented in: DC.PT, DC.PTLOWPRESS)
 Question Text *Does the process require that, as applicable to the project, while conducting tests under Subpart J – Test Requirements, every reasonable precaution is taken to protect its employees and the general public throughout the testing?*
 Assets Covered **88968 (91)**
 Result Notes **Pressure Testing P192.501**
- Section II Environmental Protection**
331. Question Result, ID, References **NA, DC.PT.PRESSTESTSAFETY.R, 192.515(a) (192.629(a), 192.629(b))** (also presented in: DC.PT, DC.PTLOWPRESS)
 Question Text *Do records indicate while conducting tests under Subpart J – Test Requirements, every reasonable precaution was taken to protect its employees and the general public throughout the testing?*

Assets Covered 88968 (91)

Result Notes No new pressure tests have occurred since last inspection

332. Question Result, ID, NA, DC.PT.PRESSTESTSAFETY.O, 192.515(a) (192.629(a), 192.629(b)) (also presented in: DC.PT, References DC.PTLOWPRESS)
Question Text *Do field observations confirm while conducting tests under Subpart J – Test Requirements, every reasonable precaution is taken to protect its employees and the general public throughout the testing?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

333. Question Result, ID, Sat, DC.PT.PRESSTESTRECORD.P, 192.517(a) (192.517(b)) (also presented in: DC.PT, DC.PTLOWPRESS)
References
Question Text *Does the process require that, as applicable to the project, creation and retention of a record of each Subpart J test for the required duration?*
Assets Covered 88968 (91)
Result Notes Pressure Testing P192.501

Section XIII Test Records

334. Question Result, ID, NA, DC.PT.PRESSTESTRECORD.R, 192.517(a) (192.517(b)) (also presented in: DC.PT, DC.PTLOWPRESS)
References
Question Text *Do records indicate creation and retention of a record for each Subpart J test performed for the required duration?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

DC.PTLOWPRESS: Pressure Testing - Low Pressure

335. Question Result, ID, NA, DC.PT.PRESSTEST.R, 192.503(a) (192.503(b), 192.503(c), 192.503(d), 192.503(e)) (also presented in: DC.PT)
References
Question Text *Do records indicate that pressure testing is conducted in accordance with 192.503?*
Assets Covered 88968 (91)
Result Notes No new pressure tests have occurred since last inspection

336. Question Result, ID, NA, DC.PT.PRESSTEST.O, 192.503(a) (192.503(b), 192.503(c), 192.503(d), 192.503(e)) (also presented in: DC.PT)
References
Question Text *Is pressure testing conducted in accordance with 192.503?*
Assets Covered 88968 (91)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

337. Question Result, ID, Sat, DC.PT.PRESSTESTENVIRON.P, 192.515(b) (192.629(a), 192.629(b)) (also presented in: DC.PT, References DC.SPT)
Question Text *Does the process require that, as applicable to the project, while conducting tests under Subpart J – Test Requirements, the test medium will be disposed of in a manner that will minimize damage to the environment?*
Assets Covered 88968 (91)
Result Notes Pressure Testing P192.501

Section II Environmental Protection

338. Question Result, ID, NA, DC.PT.PRESSTESTENVIRON.R, 192.515(b) (192.629(a), 192.629(b)) (also presented in: DC.PT, References DC.SPT)
Question Text *Do records indicate while conducting tests under Subpart J – Test Requirements, the test medium disposal was conducted in a manner that minimized damage to the environment?*
Assets Covered 88968 (91)
Result Notes No new pressure tests have occurred since last inspection

339. Question Result, ID, NA, DC.PT.PRESSTESTENVIRON.O, 192.515(b) (192.629(a), 192.629(b)) (also presented in: DC.PT, References DC.SPT)
Question Text *Do field observations confirm while conducting tests under Subpart J – Test Requirements, the test medium was disposed of in an environmentally sound manner?*

Assets Covered 88968 (91)

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

340. Question Result, ID, Sat, DC.PT.PRESSTESTSAFETY.P, 192.515(a) (192.629(a), 192.629(b)) (also presented in: DC.PT, References DC.SPT)

Question Text *Does the process require that, as applicable to the project, while conducting tests under Subpart J – Test Requirements, every reasonable precaution is taken to protect its employees and the general public throughout the testing?*

Assets Covered 88968 (91)

Result Notes Pressure Testing P192.501

Section II Environmental Protection

341. Question Result, ID, NA, DC.PT.PRESSTESTSAFETY.R, 192.515(a) (192.629(a), 192.629(b)) (also presented in: DC.PT, References DC.SPT)

Question Text *Do records indicate while conducting tests under Subpart J – Test Requirements, every reasonable precaution was taken to protect its employees and the general public throughout the testing?*

Assets Covered 88968 (91)

Result Notes No new pressure tests have occurred since last inspection

342. Question Result, ID, NA, DC.PT.PRESSTESTSAFETY.O, 192.515(a) (192.629(a), 192.629(b)) (also presented in: DC.PT, References DC.SPT)

Question Text *Do field observations confirm while conducting tests under Subpart J – Test Requirements, every reasonable precaution is taken to protect its employees and the general public throughout the testing?*

Assets Covered 88968 (91)

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

343. Question Result, ID, Sat, DC.PT.PRESSTESTRECORD.P, 192.517(a) (192.517(b)) (also presented in: DC.PT, DC.SPT) References

Question Text *Does the process require that, as applicable to the project, creation and retention of a record of each Subpart J test for the required duration?*

Assets Covered 88968 (91)

Result Notes Pressure Testing P192.501

Section XIII Test Records

344. Question Result, ID, NA, DC.PT.PRESSTESTRECORD.R, 192.517(a) (192.517(b)) (also presented in: DC.PT, DC.SPT) References

Question Text *Do records indicate creation and retention of a record for each Subpart J test performed for the required duration?*

Assets Covered 88968 (91)

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

MO.GOCLASS: Gas Pipeline Class Location

345. Question Result, ID, Sat, MO.GO.CONTSURVEILLANCE.P, 192.605(e) (192.613(a), 192.613(b), 192.703(b), 192.703(c)) (also presented in: MO.GO) References

Question Text *Are there processes for performing continuing surveillance of pipeline facilities, and also for reconditioning, phasing out, or reducing the MAOP in a pipeline segment that is determined to be in unsatisfactory condition but on which no immediate hazard exists?*

Assets Covered 88968 (91)

Result Notes Continuing Surveillance Procedure P-192.613

Section I Visual Facility Inspection

Section II Extreme Weather

346. Question Result, ID, Sat, MO.GO.CONTSURVEILLANCE.R, 192.709(c) (192.613(a), 192.613(b), 192.703(b), 192.703(c)) (also presented in: MO.GO) References

Question Text *Do records indicate performance of continuing surveillance of facilities as required, and also the reconditioning, phasing out, or MAOP reduction in any pipeline segment that was determined to be in unsatisfactory condition but on which no immediate hazard existed?*

Assets Covered 88968 (91)

Result Notes Continuing Surveillance performed annually

Record completed by field personnel

Noted Migrant Housing for farm in 2021 but only for 2 month of the year so not identified site

No comments or changes for 2022 and 2023

347. Question Result, ID, Sat, MO.GO.CONTSURVEILLANCE.O, 192.613(a) (192.613(b), 192.703(a), 192.703(b), 192.703(c)) (also References presented in: MO.GO)

Question Text *Are unsatisfactory conditions being captured and addressed by continuing surveillance of facilities and the pipeline as required by 192.613?*

Assets Covered 88968 (91)

Result Notes Ferndale performs continuing surveillance

Class location and ROW conditions seem consistent with Ferndale's inspections

MO.GMOPP: Gas Pipeline Overpressure Protection

348. Question Result, ID, Sat, MO.GM.RECORDS.P, 192.605(b)(1) (192.709(a), 192.709(b), 192.709(c)) (also presented in: References MO.GM)

Question Text *Does the process include a requirement that the operator maintain a record of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test?*

Assets Covered 88968 (91)

Result Notes Maps & Records 192.605(b)(3)

Section I

349. Question Result, ID, Sat, MO.GM.RECORDS.R, 192.605(b)(1) (192.243(f), 192.709(a), 192.709(b), 192.709(c)) (also References presented in: MO.GM)

Question Text *Do records indicate that records are maintained of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test?*

Assets Covered 88968 (91)

Result Notes All records requested were available

PD.PA: Public Awareness

350. Question Result, ID, Sat, EP.ERG.LIAISON.R, 192.603(b) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), References 192.616(c), 192.9(d), 192.9(e), ADB-2005-03) (also presented in: EP.ERG)

Question Text *Do records indicate that liaison has been established and maintained with appropriate fire, police, other public officials, and 911 emergency call centers?*

Assets Covered 88968 (91)

Result Notes Pipeline Safety Awareness Training Provided by BP/Ferndale Gas

Reviewed records from 2021 (Virtual), 2022, 2023 (Skagit County and Whatcom county Commissioners, Fire, Police on attendance sheet)

PD.RW: ROW Markers, Patrols, Monitoring

351. Question Result, ID, Sat, MO.RW.PATROL.P, 192.705(a) (192.705(b), 192.705(c)) (also presented in: MO.RW) References

Question Text *Does the process adequately cover the requirements for patrolling the ROW and conditions reported?*

Assets Covered 88968 (91)

Result Notes Right-of-Way Inspections

Procedure P#192.705

Section V

352. Question Result, ID, References Sat, MO.RW.PATROL.R, 192.709(c) (192.705(a), 192.705(b), 192.705(c)) (also presented in: MO.RW)

Question Text *Do records indicate that ROW surface conditions have been patrolled as required?*

Assets Covered 88968 (91)

Result Notes Reviewed Patrol records for 2021, 2022 and 2023

Performed weekly along with Crude and Butane lines

Procedure identifies DP information to be gathered and observed

353. Question Result, ID, References Sat, MO.RW.ROWMARKER.O, 192.707(a) (192.707(b), 192.707(c), 192.707(d), 192.9(d), 192.9(e)) (also presented in: MO.RW)

Question Text *Are line markers placed and maintained as required?*

Assets Covered 88968 (91)

Result Notes Markers were located as required, visible at all highway/railroad crossings and above ground locations

Markers in good condition with company information

354. Question Result, ID, References Sat, MO.RW.ROWCONDITION.O, 192.705(a) (192.705(c)) (also presented in: MO.RW)

Question Text *Are the ROW conditions acceptable for the type of patrolling used?*

Assets Covered 88968 (91)

Result Notes Patrolling performed by flying the line biweekly

Patrolled in conjunction with crude and butane line

355. Question Result, ID, References Sat, MO.RW.ROWMARKER.P, 192.707(a) (192.707(b), 192.707(c), 192.707(d)) (also presented in: MO.RW)

Question Text *Does the process adequately cover the requirements for placement of ROW markers?*

Assets Covered 88968 (91)

Result Notes Damage Prevention Program P192.614

Section XVI

USPL-GP 43-0119

Specification for Auxiliary Installations

Section 9 Pipeline Markers

ROW Inspections P192.705

Section VII.C

356. Question Result, ID, References Sat, MO.RW.LEAKRECORDS.P, (also presented in: MO.RW)

Question Text *Does the operator have procedures to prepare and maintain gas leak records containing all information required by WAC 480-93-178?*

Assets Covered 88968 (91)

Result Notes Leakage Surveys P192.706

Section VIII Documentation & Records

TD.CPMONITOR: External Corrosion - CP Monitoring

357. Question Result, ID, Sat, TD.CP.RECORDS.R, 192.491(a) (192.491(b), 192.491(c), 192.9(f)(1), 192.452, 192.453) (also References presented in: TD.CP, TD.CPEXPOSED)

Question Text *Do records indicate the location of all corrosion control items listed in §192.491(a)?*

Assets Covered 88968 (91)

Result Notes All requested records were available and have been provided

TD.CPEXPOSED: External Corrosion - Exposed Pipe

358. Question Result, ID, Sat, TD.CP.RECORDS.R, 192.491(a) (192.491(b), 192.491(c), 192.9(f)(1), 192.452, 192.453) (also References presented in: TD.CP, TD.CPMONITOR)

Question Text *Do records indicate the location of all corrosion control items listed in §192.491(a)?*

Assets Covered 88968 (91)

Result Notes All requested records were available and have been provided

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