

DPU - Pipeline Safety

Follow-up Briefing

9/12/2023

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Topics of this Briefing

Ref. PSC correspondence dated June 20, 2023

Notifications Filed in Docket No. 23-999-08

PHMSA Incident Reports

Inspection activities: Site visit vs paperwork audits

Results/impressions

Enforcement Actions

Specific issues on which PHMSA audits the UTPS

Results of audits in recent years



Electric
 Gas
 Telecom
 Water
 Miscellaneous
 Railroad
Find a Docket

Date	Description
September 1, 2023	Correspondence from Dominion Energy Utah, Re: Civil Penalty for Damages Sustained to Dominion Energy Gas Company's Service
July 26, 2023	Public Notice, Re: Utah Pipeline Safety Program Follow-up Briefing
July 21, 2023	Cover Letter MPLX LP's National Registry Notification No. F-20230720-44975 MPLX Attachment 1 – Stagecoach to Mapco
June 20, 2023	Correspondence from Gary L. Widerburg
June 20, 2023	Correspondence from Dominion Energy Utah, Re: Civil Penalty for Damages Sustained to Dominion Energy Gas Company's Service
June 1, 2023	Presentation of the Division of Public Utilities' Pipeline Safety 2022 Briefing Recorded Live Stream of the Utah Pipeline Safety Program Briefing Held June 1, 2023
May 5, 2023	Public Notice, Re: Utah Pipeline Safety Program Briefing
April 18, 2023	Correspondence from Dominion Energy Utah, Re: Civil Penalty for Damages Sustained to Dominion Energy Gas Company's Service
March 16, 2023	Cover Letter Corrected Holly Energy Partners – Operating L.P.'s 2022 Annual Drug & Alcohol MIS Report
March 15, 2023	Cover Letter Sinclair Transportation Company's 2022 Annual Drug & Alcohol MIS Report HF Sinclair's 2022 Annual Drug & Alcohol MIS Report
February 15, 2023	MPLX's Request for Gathering Line Type C Extension
February 10, 2023	Dominion Energy Utah's National Registry Notification No. F-20230210-39694 Dominion Energy Utah's National Registry Notification No. F-20230131-39154

Feb. 10, 2023 – DEU NRNs: F- 20230210-39694; & F - 20230131-39154

Replacement of 19,303 feet of FL033(20”) with FL134(24”) Construction of 17 miles of 6” extension to Green River

Construction notices required per 191.22(c)(1)(i)(ii)

(c) **Changes.** Each operator of a gas pipeline, gas pipeline facility, UNGSF, LNG plant, or LNG facility must notify PHMSA electronically through the National Registry of Operators at <https://portal.phmsa.dot.gov> of certain events.

(1) An operator must notify PHMSA of any of the following events not later than 60 days before the event occurs:

- (i) Construction of any planned rehabilitation, replacement, modification, upgrade, uprate, or update of a facility, other than a section of line pipe, that **costs \$10 million or more**. If 60-day notice is not feasible because of an emergency, an operator must notify PHMSA as soon as practicable;
- (ii) Construction of **10 or more miles** of a new pipeline;

Feb. 15 – MPLX's request for

Type C extension of MAOP verification per 192.9(e)(1)(ii) and Corrosion control per 192.9(g) to May 2024

These requirements were part of the new Gas Gathering regulation that went into effect May 2022 with compliance date of **May 2023**.

July 2022 PHMSA - Notice of limited enforcement discretion for Type C.

MPLX operates 355 miles of Type C in Class 1 (low risk/ least populated) in Utah.

March 15 & 16, Sinclair & Holly Energy MIS Reports Part 199 of the Pipeline Safety Regulations covers Drug and Alcohol Testing

199.119 Reporting of anti-drug testing results.

(a) Each large operator (having more than 50 covered employees) must submit an annual Management Information System (MIS) report to PHMSA of its anti-drug testing using the MIS form and instructions as required by 49 CFR part 40 (at § 40.26 and appendix H to part 40), not later than March 15 of each year for the prior calendar year (January 1 through December 31). The Administrator may require by notice in the PHMSA Portal (<https://portal.phmsa.dot.gov/phmsaportallanding>) that small operators (50 or fewer covered employees), not otherwise required to submit annual MIS reports, to prepare and submit such reports to PHMSA.

(b) Each report required under this section must be submitted electronically at <http://damis.dot.gov>. An operator may obtain the user's name and password needed for electronic reporting from the PHMSA Portal (<https://portal.phmsa.dot.gov/phmsaportallanding>).

April, June, and Sept. 2023 correspondence from DEU for civil penalties

These are civil penalties for violations of our “Damage to Underground Utility Facilities” regulations.

LDC collect these with the repair bills when excavators damage gas pipelines and forwards it to PSC to be deposited in state’s general funds.

This is in accordance with an arrangement between the AG’s office and LDC

July 21, 2023 MPLX's NRN F- 20230720-44975

This is a notification for conversion of a GG line to NGL per 191.22

(c) **Changes.** Each operator of a gas pipeline, gas pipeline facility, UNGSF, LNG plant, or LNG facility must notify PHMSA electronically through the National Registry of Operators at <https://portal.phmsa.dot.gov> of certain events.

(1) An operator must notify PHMSA of any of the following events not later than 60 days before the event occurs:

(vi) A pipeline converted for service under § 192.14 of this chapter, or **a change in commodity** as reported on the annual report as required by § 191.17.

Incident reports

§ 191.9 Distribution system: Incident report.

(a) Except as provided in paragraph (c) of this section, each operator of a distribution pipeline system shall submit Department of Transportation Form RSPA F 7100.1 as soon as practicable but not more than 30 days after detection of an incident required to be reported under § 191.5.

§ 191.15 Transmission systems; gathering systems; liquefied natural gas facilities; and underground natural gas storage facilities: Incident report.

(a) *Pipeline systems* —

(1) *Transmission, offshore gathering, or regulated onshore gathering.* Each operator of a transmission, offshore gathering, or a regulated onshore gathering pipeline system must submit Department of Transportation (DOT) Form PHMSA F 7100.2 as soon as practicable but not more than 30 days after detection of an incident required to be reported under § 191.5.

<https://www.phmsa.dot.gov/forms/gas-distribution-incident-report-form-f-7100-1>

<https://www.phmsa.dot.gov/forms/gas-transmission-gathering-and-ungs-incident-report-form-f-71002>

2022 Number of Inspections

Inspection activities: Site visit vs paperwork

Results/impressions

Enforcement Actions

- Conducted 48 inspections
- Compliance Action – 26 Notice of Probable Violations (NOPVs) issued for a total of 83 probable violations
- 86 individual probable violations were corrected during 2022 –
3 carry-over from previous years
- There were no enforcement actions taken during 2022
- There has been only 4 enforcement actions in the last 29 years.

Inspection Length

- LDC – 10 inspection Units: 6-days per unit (Region)
- Municipalities, gathering and intrastate transmission –
1 inspection unit each: 3-5 days
- Master meter: ½-1 day
- Construction inspections are a daily inspection and large construction sites may be inspected on multiple days or multiple times throughout the project
- Incidents investigations vary per incident

Inspection Types

- The type of inspection is based on UTPS' 3-5 Year Inspection Cycle:

1.	Standard inspections	1 years
2.	Operation and Maintenance Plan	3 years
3.	Emergency Plan	3 years
4.	LNG	3 years
5.	Anti-Drug and Alcohol Plan	5 years
6.	Public Awareness Plan	5 years
7.	Operator Qualification Plan	5 years
8.	D I M Program Plan/Section 114	5 years
9.	Integrity Management Program Plan/Section 114	5 years
10.	Control Room Management Plan	5 years
11.	Master Meter	5 years

Site Visits vs. Paperwork Audits

- Standard inspection has a review of operational procedures/ records and a field inspection including OQ field, PA effectiveness, TIMP/DIMP annual activities
- Operational plans such as O&M, Emergency, OQ, PA, TIMP/DIMP, and D&A inspected on the 3–5-year inspection cycle
- Prior to 2020, inspections were conducted in person on site. From 2020 and going forward, records and procedure inspections may be conducted virtually or in person on site with a field inspection on site

Paperwork Audits – Records and Procedures

- Inspection of Operational Plans and records include all aspects of the operation and maintenance of pipelines, components and facilities
- At a minimum must include but are not limited to; leak surveys, patrolling, corrosion control, odorization, valves, MAOP, regulator stations, relief devices, vaults, IMP, DIMP, ILI, SRCs, OQ, PAPE, construction, incidents, customer odor complaints and farm taps, if applicable.
- Inspections are conducted using the PHMSA IA software program.

Site Visits - Field Inspections

- The Field Inspection includes an on-site inspection of the operator's facilities to confirm that system maintenance is being performed as prescribed by the plans/procedures and indicated by the operator's records.
- UTPS physically conducts an on-site inspection of existing system facilities, such as but not limited to, regulating stations, odorizers, commercial and industrial meters and regulators, relief devices and vents, exposed mains & transmission pipes, valves, rectifiers, CP Test Stations, CP Bonds, compressor stations, etc. Photographs are recommended to support any probable violations found.

Specific issues on which PHMSA audits the UTPS

Results of audits in recent years

	2017	2018	2019	2020	2021	2022
Progress Report	50/50	50/50	50/50	50/50	50/50	50/50
Evaluation	113/114	107/109	94/ 94	97/100	100/100	100/100

Progress report

1. Stats on Operators/inspection units and % inspected
2. State Inspection Activity Data
3. List of Operators Data
4. Incidents/Accidents Data
5. Stats of Compliance Actions Data
6. List of Records Kept Data
7. Staff and TQ Training Data
8. Compliance with Federal Regulations Data
9. Blank
10. Performance and Damage Prevention Question Data

Evaluation

- A – Progress Report and Program Documentation Review
- B – Program Inspection Procedures
- C – State Qualification
- D – Program Performance
- E – Field Inspection
- F – Damage Prevention
- G – Interstate Agent (NA)

Questions

Jimmy Betham

Demonstration of

PHMSA's Inspector Assistant (IA) software