

# Inspection Statistics 2025 Year in Review



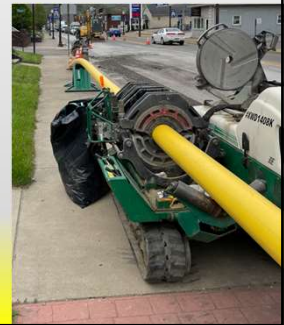
## 2025 Review of Inspections

- Inspections performed in 2025
  - Inspections for this presentation are:
    - Procedures such as O&M, Control Room Management
    - Plans such as OQ, Drug and Alcohol, Public Awareness
    - Records such as Maintenance, Integrity
  - Inspections not included in this presentation
    - Construction
    - Field Inspections



## 2025 Review of Inspections

- Inspections performed in 2025
  - 94 inspections with 39 unique Operators
    - This total reaches 43 in the following breakdown because some companies operate in multiple categories (e.g., both Gas Transmission and Distribution).



## 2025 Review of Inspections

Type of Inspection	Gas Distribution	Gas Trans	Hazardous Liquid	Gas Gathering	TOTAL
<b>No. of Operators</b>	9	11	6	17	<b>43</b>
Operator Qualifications (OQ)	2	2	1	4	<b>9</b>
Public Awareness Program (PAP)	2	1	1	2	<b>6</b>
Standard Records /OQ Field	24	9	4	7	<b>44</b>
Drug and Alcohol	2	3	1	4	<b>10</b>
Standard Records	2	0	0	5	<b>7</b>
Operation & Maintenance	2	3	1	1	<b>7</b>
Integrity Management Plan (IMP)	3	3	2	0	<b>8</b>
Control Room Management (CRM)	0	2	1	0	<b>3</b>
<b>TOTAL</b>	<b>37</b>	<b>23</b>	<b>11</b>	<b>23</b>	<b>94</b>

**Concern:** The operator meets requirements, but identified issues or missing details—such as record errors—risk future **non-compliance** if not addressed through **improvements**.

## 2025 Review of Inspections

- **Definitions**
  - **Unsatisfactory** - The operator fails to meet minimum code requirements.
  - **Concern** –The operator meets requirements, but identified issues or missing details—such as record errors—risk future non-compliance if not addressed through improvements.



## 2025 Review of Inspections

### 94 Inspections

- **51 Unsatisfactory Results from all Inspections**
  - 17 Unsatisfactory from the Gas Distribution Inspections
  - 22 Unsatisfactory from the Gas Transmission Inspections
  - 9 Unsatisfactory from the Hazardous Liquid Inspections
  - 3 Unsatisfactory from the Gas Gathering Inspections
- **229 Concerns from all Inspections**
  - 21 Concerns from the Gas Distribution Inspections
  - 168 Concerns from the Gas Transmission Inspections
  - 21 Concerns from the Hazardous Liquid Inspections
  - 19 Concerns from the Gas Gathering Inspections



## 2025 Review of Inspections

Approximately

- 1 finding / inspection for Gas Distribution
- 8 findings / inspection for Gas Transmission
- 2 ¾ findings / inspection for Hazardous Liquid
- 1 finding / inspection for Gas Gathering

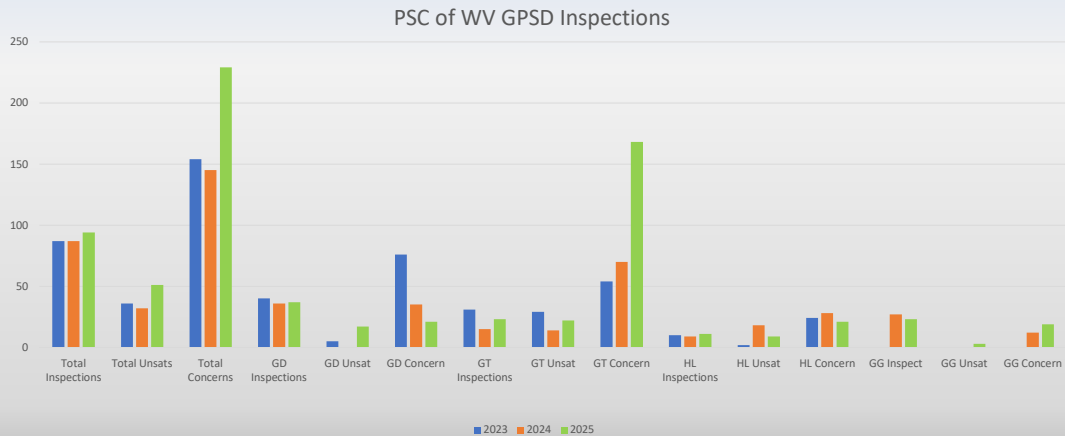


## 2025 Review of Inspections

Unsatisfactory – Category - 51 Total Top 4		Concern – Category – 229 Total Top 4	
16	Time Dependent Threats	42	Time Dependent Threats
14	Records	36	Maintenance and Operation
4	Training and Qualification	29	Assessment and Repair
3	Maintenance and Operation	25	Integrity Management



## 2025 Review of Inspections



## 2024 Review of Inspections

- **Gas Distribution - 37 Inspections with 9 Operators**
  - 17 Unsatisfactory findings (2 Operators)
    - 14 Records
    - 3 Distribution Integrity Management
  - 21 Concerns (6 Operators)
    - 11 Records
    - 3 Procedures
    - 2 Maintenance and Operations (records)



## 2025 Review of Inspections

- Gas Distribution - 37 Inspections with 9 Operators
- Unsatisfactory findings - Example
  - Do records document inspection of aboveground pipe for atmospheric corrosion



- Uncoated steel pipe above ground has had leakage inspections but no atmospheric corrosion inspections. In addition, this pipe is not coated.

## 2025 Review of Inspections

- Gas Distribution - 37 Inspections with 9 Operators
- Unsatisfactory findings – Example
  - Do records adequately document cathodic protection monitoring tests have occurred as required



- Test Station out of compliance. Should have been repaired before subsequent inspection cycle.

## 2025 Review of Inspections

- Gas Distribution - 37 Inspections with 9 Operators
  - Unsatisfactory findings – Example
    - Do records indicate distribution leakage surveys were conducted as required?
      - Form did not indicate who performed the survey (can not determine who performed the survey or if they were operator qualified)
      - Missing surveys



## 2025 Review of Inspections

- Gas Distribution - 37 Inspections with 9 Operators
  - Unsatisfactory findings – Example
    - Distribution Integrity Management
      - Do the procedures identify or reference the appropriate characteristics (e.g., Design, Operating Conditions, Operating Environmental Factors) necessary to assess the threats and risks to the pipeline
        - Characteristics of purchased pipeline systems, especially that of flooding, are not mentioned or considered in the operator's assessments of risk and threat



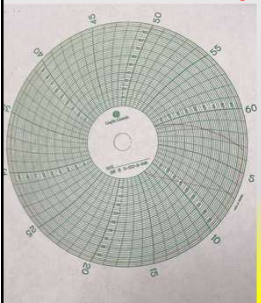
## 2025 Review of Inspections

- Gas Distribution - 37 Inspections with 9 Operators
  - Unsatisfactory findings – Example
    - Distribution Integrity Management
      - Do records demonstrate that the operator followed procedures to identify threats to the system
      - Plan states "Equipment malfunctions due to Regulators/Relief Valves prone to failure are not present." and DIMP states that failure is not a threat, however there has been a regulator malfunction in that area as noted in the annual report.



## 2025 Review of Inspections

- Gas Distribution - 37 Inspections with 9 Operators
  - Concern findings – Example
    - Do records show that proposed pipe design plans include provisions for support or resistance against excessive torsional loads, shearing loads when the valve or shutoff is operated, or from any other secondary stresses that might be exerted on the valves?
    - Missing Record – not documented



## 2025 Review of Inspections

- Gas Distribution - 37 Inspections with 9 Operators
  - Concern findings – Example
    - 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
    - Odorant reading at one location showed readings in January outside of compliance, subsequent reading in June were within compliance. There was no documentation showing any follow-up work done in response to the readings indicating gas to air readings above 1% RDL gas in air.



## 2025 Review of Inspections

- Gas Transmission - 23 Inspections with 11 Operators
  - 22 Unsatisfactory (4 Operators)
    - 16 Time Dependent Threats
    - 3 Training and Qualification
  - 168 Concerns (10 Operators)
    - 35 Time Dependent Threats
    - 31 Maintenance and Operations
    - 22 Control Room Management
    - 20 Assessment and Repair
    - 19 Integrity management



## 2025 Review of Inspections

- Gas Transmission - 23 Inspections with 11 Operators

- Unsatisfactory findings - Example

- Do records adequately document that exposed buried piping was examined for corrosion and deteriorated coating?

- A pipe inspection was not available for review due to the installation of an anode. The operator could not produce a pipe inspection for this instance.



## 2025 Review of Inspections

- Gas Transmission - 23 Inspections with 11 Operators

- Unsatisfactory findings - Example

- For onshore gas transmission pipelines, does the remedial action plan adequately document actions taken to determine the extent of inadequate cathodic protection, and correct any identified deficiencies in corrosion

- Readings below -0.850 V



## 2025 Review of Inspections

- Gas Transmission - 23 Inspections with 11 Operators
  - Unsatisfactory findings - Example
    - 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



- These records did not indicate who completed the inspection of each valve.
- No key valves had been identified, therefore, no inspections had been completed.

## 2025 Review of Inspections

- Gas Transmission - 23 Inspections with 11 Operators
  - Concern findings – Example
    - Do records document details of electrical checks of sources of rectifiers or other impressed current sources



- The operator indicated that they are visiting the rectifier at least once every quarter, however the operator did not have a record to document the annual inspection of the rectifier to ensure that it is in acceptable condition as required per 192.465 (b)(2)

## 2025 Review of Inspections

- Gas Transmission - 23 Inspections with 11 Operators
  - Concern findings – Example
    - For onshore gas transmission pipelines, does the process require that the operator develop a remedial action plan to determine the extent of the area affected when low cathodic protection levels are detected?
      - No procedure to comply with of the newer provision of the regulations, 192.465(f)(2)

## 2025 Review of Inspections

- Gas Transmission - 23 Inspections with 11 Operators
  - Concern findings – Example
    - For onshore gas transmission pipelines, does the process require prompt actions are taken to correct any identified deficiencies in corrosion control found during inspections/testing?
      - No procedure to comply with the newer provision of the regulations
        - *Develop a remedial action plan and apply for any necessary permits within 6 months of completing the inspection.*
        - *Remedial action must be completed promptly, but no later than the earliest of the following: prior to the next inspection or test interval required by this section*
        - *Or as soon as practicable, not to exceed 6 months, after obtaining any necessary permits*



## 2025 Review of Inspections

- Gas Transmission - 23 Inspections with 11 Operators
  - Concern findings – Example
    - Do records document inspection of aboveground pipe for atmospheric corrosion
    - Inspection of facilities did not match atmospheric corrosion records



## 2025 Review of Inspections

- Gas Gathering - 23 Inspections with 17 Operators
  - 3 Unsatisfactory – 1 Operator had unsatisfactory findings
    - 3 Public Awareness and Damage Prevention
  - 19 Concerns - 5 Operators had concerns
    - 8 Public Awareness and Damage Prevention
    - 6 Drug and Alcohol
    - 2 Emergency Preparedness and Response



## 2025 Review of Inspections

- Gas Gathering - 23 Inspections with 17 Operators
  - Unsatisfactory findings – Example
    - Public Awareness and Damage Prevention
      - Were relevant factors considered to determine the need for supplemental public awareness program enhancements for each stakeholder audience, as described in API RP 1162 [192.616(c)]
      - The Operators Public Awareness Program does not currently have any language addressing supplemental public awareness.



## 2025 Review of Inspections

- Gas Gathering - 23 Inspections with 17 Operators
  - Concern findings – Example
    - Do records indicate that liaison has been established and maintained with appropriate fire, police, other public officials, and 911 emergency call centers
    - Operator utilized Paradigm, but did not attend local meetings, thus can it be established an interface with emergency responders has occurred?



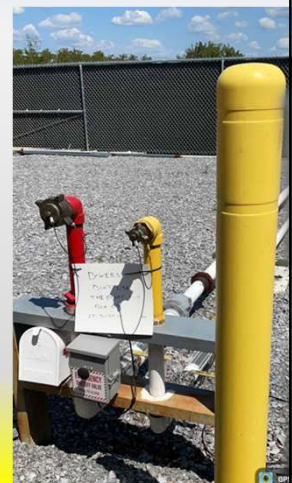
## 2025 Review of Inspections

- Gas Gathering - 23 Inspections with 17 Operators
  - Concern findings – Example
    - Have effectiveness evaluation(s) of the program been performed for all stakeholder groups in all notification areas along all systems covered by the program?
      - Documentation of Effective Evaluations is lacking



## 2025 Review of Inspections

- Hazardous Liquids - 11 Inspections with 6 Operators
  - 9 Unsatisfactory – 2 Operator had unsatisfactory findings
    - 3 Leak Detection
    - 2 Maintenance and Operations
    - 2 Emergency Preparedness and Response
  - 21 Concerns - 4 Operators had concerns
    - 9 Assessment and Repair
    - 6 Integrity Management
    - 4 Time Dependent Threats



## 2025 Review of Inspections

- Hazardous Liquid - 11 Inspections with 6 Operators
  - Unsatisfactory findings – Example
    - Do records indicate inspection and testing of each overpressure safety device on HVL pipelines at intervals not to exceed 7.5 months, but at least twice each calendar year
      - Missing Records



## 2025 Review of Inspections

- Hazardous Liquid - 11 Inspections with 6 Operators
  - Unsatisfactory findings – Example
    - Have annual reviews of the emergency response training program been conducted and appropriate changes made as necessary to ensure it is effective
      - Missing Record



## 2025 Review of Inspections

- Hazardous Liquid - 11 Inspections with 6 Operators
  - Unsatisfactory findings – Example
    - Are adequate records containing the required elements maintained for contractor personnel
    - Operator's procedures not followed to ensure thorough evaluation of individuals performing covered tasks are qualified.



## 2025 Review of Inspections

- Hazardous Liquid - 11 Inspections with 6 Operators
  - Concern findings – Example
    - Do the records demonstrate the process for confirming ASV shut-in pressures
    - Closure rate not documented
    - No signature of technician performing inspection



## 2025 Review of Inspections

- Hazardous Liquid - 11 Inspections with 6 Operators
  - Concern findings – Example
    - Does the process ensure that the records required for the integrity management program are maintained?
    - There is a list of the files to be maintained. However, some of the retention intervals less than code requirements.



## 2025 Review of Inspections

- Hazardous Liquid - 11 Inspections with 6 Operators
  - Concern findings – Example
    - Do maps and or records document cathodic protection system appurtenances that have been installed on pipelines that have been constructed, relocated, replaced, or otherwise changed or been converted to hazardous liquid service
    - All features of cathodic system not documented in GIS



## 2025 Review of Inspections

- Hazardous Liquid - 11 Inspections with 6 Operators
  - Concern findings – Example
    - Do records indicate the operator conducted the required inspection following an extreme weather or natural disaster event
      - Inspection conducted, but no documentation



## 2025 Review of Inspections

