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**Gas Distribution Integrity Management - Plan Implementation**

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| **1. Plan Implementation - Implement Date** Was the plan written and implemented per the requirement of 192.1005 by 08/02/2011? (GDIM.QA.PLANIMPLEMENT.P)  |
| 192.1005  |
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| **2. Plan Implementation - Data Sources** Do the procedures identify or reference the appropriate sources used to determine certain characteristics (e.g., Design, Operating Conditions, Operating Environmental Factors) necessary to assess the threats and risks to the pipeline? (GDIM.RA.SOURCES.P)  |
| 192.1007(a)(1)  |
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**Gas Distribution Integrity Management - Knowledge of the System**

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| **1. System Knowledge - Information Considered** Do the procedures require the consideration of information gained from past design, operations, and maintenance (e.g., O&M activities, field surveys, One-Call system information, excavation damage, etc.)? (GDIM.RA.INFORMATION.P)  |
| 192.1007(a)(2)  |
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| **2. System Knowledge - Gaps** Does the plan contain procedures to identify additional information that is needed to fill gaps due to missing, inaccurate, or incomplete records? (GDIM.RA.GAPS.P)  |
| 192.1007(a)(3)  |
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| **3. System Knowledge - Information Needed** Do the procedures specify the means to collect the additional information needed to fill gaps due to missing, inaccurate, or incomplete records (e.g., O&M activities, field surveys, One-Call System, etc.)? (GDIM.RA.INFONEEDS.P)  |
| 192.1007(a)(3)  |
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| **4. System Knowledge - Information Needed** Does the plan list the additional information needed to fill gaps due to missing, inaccurate, or incomplete records? (GDIM.RA.INFONEEDS.R)  |
| 192.1007(a)(3)  |
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| **5. System Knowledge - New Pipe Data** Do the procedures require the capture and retention of data on any new pipeline installed? (GDIM.RA.NEWPIPEDATA.P)  |
| 192.1007(a)(5)  |
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| **6. System Knowledge - New Pipe Data** Does the data required for capture and retention include, at a minimum, the location where the new pipeline is installed and the material from which it is constructed? (GDIM.RA.NEWPIPEDATA.R)  |
| 192.1007(a)(5)  |
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| **7. System Knowledge - Implementation** Do records demonstrate implementation of the element "Knowledge of the System"? (GDIM.RA.DEMOKNOWLEDGE.R)  |
| 192.1007(a)  |
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| **8. System Knowledge - Understanding** Has the operator demonstrated an adequate understanding of the system? (GDIM.RA.DEMOUNDERSTANDING.R)  |
| 192.1007(a)  |
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**Gas Distribution Integrity Management - Identify Threats**

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| **1. Identify Threats - Information Considered** Did the operator consider the information that was reasonably available to identify existing and potential threats? (GDIM.RA.INFOCONSIDERED.P)  |
| 192.1007(b)  |
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| **2. Identify Threats - Information Considered** In identifying threats did the information considered include all of the required data and information sources? (GDIM.RA.INFOCONSIDERED.R)  |
| 192.1007(b)  |
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| **3. Identify Threats - Outside Sources** Do the procedures consider, in addition to the operator's own information, data from external sources (e.g. trade associations, government agencies, or other system operators, etc.) to assist in identifying potential threats? (GDIM.RA.OUTSIDESOURCES.P)  |
| 192.1007(b)  |
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| **4. Identify Threats - Threats Considered** In identifying threats, do the procedures include consideration of all of the required threat categories to each gas distribution pipeline? (GDIM.RA.THREATCATEGORIES.P)  |
| 192.1007(b)  |
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| **5. Identify Threats - Implementation** Do records demonstrate implementation of the element "Identify Threats"? (GDIM.RA.IMPLEMENTTH.R)  |
| 192.1007(b)  |
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**Gas Distribution Integrity Management - Evaluate and Rank Risk**

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| **1. Rank Risk - Methodology** Do the procedures contain the method(s) and/or a model used to determine the relative importance of each threat and estimate and rank the risks posed? (GDIM.RA.RISKRANKING.P)  |
| 192.1007(c)  |
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| **2. Rank Risk - Threats Considered** Do the procedures to evaluate and rank risk consider each applicable current and potential threat? (GDIM.RA.THREATSCONSIDERED.P)  |
| 192.1007(c)  |
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| **3. Rank Risk - Likelihood** Do the procedures to evaluate and rank risk consider the likelihood of failure associated with each threat? (GDIM.RA.LIKELIHOOD.P)  |
| 192.1007(c)  |
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| **4. Rank Risk - Consequences** Do the procedures to evaluate and rank risk consider the potential consequence of failure for all applicable threats? (GDIM.RA.CONSEQUENCE.P)  |
| 192.1007(c)  |
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| **5. Rank Risk - System Subdivision** If subdivision of system occurs, does the plan subdivide the system into regions with similar characteristics and for which similar actions are likely to be effective in reducing risk? (GDIM.RA.SUBDIVIDE.R)  |
| 192.1007(c)  |
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| **6. Rank Risk - Results** Are the results of the risk ranking supported by the risk evaluation model/method? (GDIM.RA.RESULTS.R)  |
| 192.1007(c)  |
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| **7. Rank Risk - Validation** Did the operator validate the results generated by the risk evaluation model/method? (GDIM.RA.RESULTSVALIDATION.R)  |
| 192.1007(c)  |
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| **8. Rank Risk - Implementation** Do records demonstrate implementation of the element "Evaluate and Rank Risk"? (GDIM.RA.IMPLEMENTRR.R)  |
| 192.1007(c)  |
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**Gas Distribution Integrity Management - Preventive and Mitigative Actions**

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| **1. Measures to Reduce Risk - Identification** Does the plan include procedures to identify when measures, beyond minimum code requirements specified outside of Part 192 Subpart P, are required to reduce risk? (GDIM.PM.IDENTIFYMEASURES.P)  |
| 192.1007(d)  |
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| **2. Measures to Reduce Risk - Identification** When measures, beyond minimum code requirements specified outside of Part 192 Subpart P, are required to reduce risk, does the plan identify the measures selected, how they will be implemented, and the risks they are addressing? (GDIM.PM.IDENTIFYMEASURES.R)  |
| 192.1007(d)  |
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| **3. Measures to Reduce Risk - Leak Management** Does the plan include an effective leak management program (unless all leaks are repaired when found)? (GDIM.PM.LEAKMANAGEMENT.P)  |
| 192.1007(d)  |
|   |  |  |  |  |  |  |  |
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| Sat+ | Sat | Concern | Unsat | NA | NC |  |  |
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| **4. Measures to Reduce Risk - Implementation** Do records demonstrate implementation of the measures, required by Part 192 Subpart P, to reduce risk? (GDIM.PM.IMPLEMENTPM.R)  |
| 192.1007(d)  |
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| Sat+ | Sat | Concern | Unsat | NA | NC |  |  |
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**Gas Distribution Integrity Management - Measure Performance and Evaluate Effectiveness**

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| **1. Measure Performance - Baseline** Does the plan contain procedures for how the operator established a baseline for each performance measure? (GDIM.QA.PERFMEASUREBASELINE.P)  |
| 192.1007(e)  |
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| Sat+ | Sat | Concern | Unsat | NA | NC |  |  |
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| **2. Measure Performance - Baseline** Does the plan establish a baseline for each performance measure? (GDIM.QA.PERFMEASUREBASELINE.R)  |
| 192.1007(e)  |
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| Sat+ | Sat | Concern | Unsat | NA | NC |  |  |
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| **3. Measure Performance - Data Collection** Does the operator have procedures to collect the data for each performance measure? (GDIM.QA.PERFMEASUREDATA.P)  |
| 192.1007(e)  |
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| Sat+ | Sat | Concern | Unsat | NA | NC |  |  |
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| **4. Measure Performance - Monitoring** Do the procedures require the operator to monitor each performance measure? (GDIM.QA.PERFMEASUREMONITOR.P)  |
| 192.1007(e)  |
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| Sat+ | Sat | Concern | Unsat | NA | NC |  |  |
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| **5. Measure Performance - Measure Effectiveness** When measures are required to reduce risk, does the plan provide/describe what type and/or what specific performance measures will be used to measure effectiveness? (GDIM.QA.MEASUREEFFECTIVENESS.P)  |
| 192.1007(e)  |
|   |  |  |  |  |  |  |  |
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| Sat+ | Sat | Concern | Unsat | NA | NC |  |  |
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| **6. Measure Performance - Implementation** Do records demonstrate implementation of the element "Measure Performance, Monitor Results, and Evaluate Effectiveness"? (GDIM.QA.IMPLEMENTEV.R)  |
| 192.1007(e)  |
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| Sat+ | Sat | Concern | Unsat | NA | NC |  |  |
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**Gas Distribution Integrity Management - Periodic Evaluation**

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| **1. Periodic Evaluation - Requirements** Do the procedures for periodic evaluation include all of the requirements of §192.1007(f)? (GDIM.CA.PERIODICEVAL.P)  |
| 192.1007(f)  |
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| Sat+ | Sat | Concern | Unsat | NA | NC |  |  |
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| **2. Periodic Evaluation - Implementation** Do records demonstrate implementation of the element "Periodic Evaluation and Improvement"? (GDIM.CA.PERIODICEVAL.R)  |
| 192.1007(f)  |
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| Sat+ | Sat | Concern | Unsat | NA | NC |  |  |
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**Gas Distribution Integrity Management - Reporting**

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| **1. Report Results - Performance Measures** Does the plan contain or reference procedures for reporting, on an annual basis, the four measures listed in 192.1007(e)(1)(i) through (e)(1)(iv) to PHMSA as part of the annual report required by 191.11 and the State regulatory authority? (GDIM.RR.ANNUALREPORT.P)  |
| 192.1007(g)  |
|   |  |  |  |  |  |  |  |
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| Sat+ | Sat | Concern | Unsat | NA | NC |  |  |
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| **2. Report Results - Submittal** Has the operator submitted the required reports? (GDIM.RR.SUBMITREPORTS.R)  |
| 192.1007(g)  |
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| Sat+ | Sat | Concern | Unsat | NA | NC |  |  |
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**Gas Distribution Integrity Management - Records Required to be Kept**

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| **1. Records - Requirements** Are there procedures specifying which records demonstrating compliance with Subpart P will be maintained for at least 10 years? (GDIM.QA.RECORDREQUIREMENTS.P)  |
| 192.1011  |
|   |  |  |  |  |  |  |  |
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| Sat+ | Sat | Concern | Unsat | NA | NC |  |  |
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| **2. Records - IM Plans** Are there procedures specifying that copies of superseded integrity management plans will be maintained for at least 10 years? (GDIM.QA.PLANRETENTION.P)  |
| 192.1011  |
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| Sat+ | Sat | Concern | Unsat | NA | NC |  |  |
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| **3. Records - Implementation** Has the operator maintained the required records? (GDIM.QA.RECORDREQUIREMENTS.R)  |
| 192.1011  |
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| Sat+ | Sat | Concern | Unsat | NA | NC |  |  |
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| Notes |

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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.