

BEFORE THE  
STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION

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In the Matter of  
Corning Natural Gas Corporation  
Case 16-G-0369  
October 2016

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Prepared Exhibits of:  
Staff Gas Safety Panel

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State of New York  
Department of Public Service  
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List of Exhibits

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Relied Upon Corning Natural Gas Corporation Responses to  
Information Requests

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**STAFF OF THE DEPARTMENT OF PUBLIC SERVICE  
INTERROGATORY/DOCUMENT REQUEST**

**Corning Natural Gas Corporation  
Case 16-G-0369  
Gas Rates**

**Request No.:** DPS-215 GSP-6  
**Requested By:** Gas Safety Panel  
**Requested of:** Matt Cook  
**Date of Request:** July 19, 2016  
**Response Due Date:** July 29, 2016  
**Subject:** Gas Safety: Leak Prone Pipe (LPP)

Provide the following information:

1. Provide the total mileage of LPP replaced, per material type, during the calendar years 2011 through 2015, and the associated costs.
2. Provide a breakdown of the remaining inventory of leak prone pipe (mains and services) by material type and diameter, as of December 31<sup>st</sup> 2015.

Response: Amount of LPP Replaced (Miles) by Material Type and LPP remaining as of 12/31/15

Category	2011	2012	2013	2014	2015	LPP Remaining as of 12/31/15	
						Main (Miles)	Services
Bare Unprotected	4.1	6.7	6.4	8.5	9.5	61.4	1710
Coated Unprotected	0.5	1.4	4.5	1.0	0.3	38.1	27
Bare Protected	5.2	1.0	0.3	1.1	1.6	13.2	0
Unknown	0	0	0	0	0	0	1292

Name of Respondent: Matt Cook  
Position of Respondent: Vice President, Operations  
Date of Response: July 29, 2016

**STAFF OF THE DEPARTMENT OF PUBLIC SERVICE**  
**INTERROGATORY/DOCUMENT REQUEST**

**Corning Natural Gas Corporation**  
**Case 16-G-0369**  
**Gas Rates**

**Request No.:** DPS-227 MT-2  
**Requested By:** Mimi Tran  
**Information Requested of:** M. Cook  
**Date of Request:** July 21, 2016  
**Response Due Date:** July 31, 2016  
**Subject:** Bare and Uncoated Unprotected Steel Main and Services

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1. The direct testimony of Mr. Cook, page 10, line 3 to 7, stated “*Corning identifies the pipes to be replaced based upon type and age of material, geographic location, cathodic protection status and quantity of leaks. Those areas of mains and services are grouped and bid to contractors for replacement.*”
  - a. Provide a detailed description of the processes that Corning uses to identify mains and services to be replaced.
  - b. Provide all models, including but not limited to: risk model and/or leak records, that Corning uses to identify mains and services to be replaced.
  - c. For each Calendar Year from 2012 to 2015, provide the percentage breakdown how much main and service replacement work was done by Company employee and how much was done by contractors.
  - d. Provided all the “grouped areas” of main and services to be replaced in each CY from 2017 through 2020.

Response:

- a. Corning uses a basic process to identify facilities to be replaced. Appended as Attachment DPS-227(1) is the Company’s Risk Based Assessment process that ranks a segment of steel pipe based on leak history, material, population density, facility cover, operational issues, prior enhancements and municipal requirements. Using the Record included in this process, each segment of steel pipe has been ranked and recorded. Each year Engineering reviews the reports, related corrosion data and excavation reports then determines what segments will be replaced. In most cases, the segments are grouped by neighborhood, streets or sub-developments.
- b. See Attachment DPS-227(1). Existing and repaired leaks and material types are plotted on Corning’s mapping allowing Engineering the ability to see leak concentrations and to determine facility material. Population density and facility cover are obtained from field reviews during layout. Operational issues are determined from records maintained such as multiple leak calls to the same location

- or multiple water/freeze-off calls. Corning additionally sends letters to municipalities requesting their road construction schedules for the following year.
- c. For each CY 2012 to 2015 the percentage breakdown for Company replacement versus contractor replacement is 5% Company and 95% Contractor.
  - d. Corning begins design on its replacement projects during the summer the year prior to the commencement of work. The Company has just begun the design for 2017 work this summer and will not know the projects until engineering is complete and bidding occurs. This process will be the same for projects from 2018 to 2020.

Name of Respondent: Matt J. Cook

Position of Respondent: Vice President – Operations, Corning Natural Gas Corporation

Date of Response: August 10, 2016

**Attachment DPS-227(1)**

# Corning Natural Gas Corporation

## Risk Based Assessment

### Systematic Replacement Program

#### Process

Review the segments annually and rank them based upon the system provided. The segment with the highest ranking is to be replaced first. In case multiple segments are ranked the same and one or more of them are not repaired in that year then written justification must be completed as to why another project was chosen. Lower ranking projects can be moved up in ranking with written justification signed by the Vice President of Operations.

A system leak review will be performed annually to determine if they fall into the criteria listed in the following ranking system. This system leak review will be documented in a paragraph indicating what was reviewed, when and by whom. Those segments or areas that fall into the ranking system will each be ranked and recorded on the attached Risk Based Assessment Ranking Record.

	<b><u>Rank</u></b>
<b>Leak History</b>	
Five leaks within any continuous 500 foot segment of pipe or; Three leaks in three years	7
Three to four leaks within any continuous 500 foot segment of pipe	5
One to two leaks within any continuous 500 foot segment of pipe	3
<b>Facility Material</b>	
Bare steel Installed between 1950 – 1960	4
Threaded and Coupled	3
Other Bare Steel	2
Coated Steel	1
<b>Population Density</b>	
Class 4 Location	7
Class 3 Location	5
Class 2 Location	2
Class 1 Location	1
<b>Facility cover</b>	
Hard – Asphalt, concrete, etc.	2
Soft – dirt, grass, etc.	1
<b>Operation issues</b>	
Water-offs, freeze-offs, leak complaints	1
Not Applicable	0
<b>System Enhancement</b>	
Pressure increase due to system load increase	2
Convert from low to medium, Reduce from two mains to one in a street	1
Not Applicable	0
<b>Municipal Requirements</b>	
Repaving projects, other infrastructure replacement	1
Not Applicable	0

# Corning Natural Gas Corporation

## Risk Based Assessment

### Systematic Replacement Program

#### Description

**Leak History** – Count all the leaks whether repaired or active within a continuous 500 foot length of the pipe. If five or more leaks (repaired or active) are found in a 500 foot segment this will receive the highest ranking of 7. Three to four leaks will receive a rank of 5, and one to two will receive a 3.

**Facility Material** – Determine from the system map and/or work orders the material of the pipe and assign a rank based on the material.

**Population Density** – This is the number of people and buildings adjacent to the facility. This designation is based upon the 16NYCRR Part 255 and is defined as follows:

- (a) Except as provided in paragraphs (d) (2) and (e)(2) of this section, the class location is determined by the number of buildings intended for human occupancy in the class location unit. The class location unit is an area that extends 220 yards on either side of the centerline of any continuous 1-mile length of pipeline. For the purposes of this section, each separate dwelling unit in a multiple dwelling building is counted as a separate building intended for human occupancy.
- (b) A **Class 1 location** is any class location unit that has 10 or fewer buildings intended for human occupancy.
- (c) A **Class 2 location** is any class location unit that has more than 10 but fewer than 46 buildings intended for human occupancy.
- (d) A **Class 3 location** is:
  - (1) any class location unit that has more than 46 buildings intended for human occupancy; or
  - (2) an area where the pipeline lies within 100 yards of either a building or a small, well-defined outside area that is occupied by 20 or more persons during normal use (such as a playground, recreation area, outdoor theater, or other place of public assembly).
- (e) A **Class 4 location** is:
  - (1) any class location unit that has 100 or more buildings intended for human occupancy and where wall to wall pavement is prevalent; or
  - (2) any class location unit where buildings with four or more stories above ground are prevalent.

# Corning Natural Gas Corporation

## Risk Based Assessment

Systematic Replacement Program

**Facility Cover** – This is the type of ground that is prevalent over the top of the facility.

**Operation Issues** – This is other issues that may be affecting the operation of the system such as liquids in a low pressure system that causes service water and freeze-offs. Review records to determine if the Company has received more than 3 complaints of the same issue from the same address. If more than three complaints have been received then this will receive the highest ranking of 1. If three or less complaints received then the rank will be zero.

**System Enhancement** – This is the ability to take into account the Company wishing to improve the system by converting from low pressure to intermediate or the possibility of omitting one of two parallel mains on the same street, or the chance to improve reliability by replacing undersized pipe for pressure improvement.

**Municipal Requirements** – Determine if the local municipality will be resurfacing the road above the main or they are replacing subsurface infrastructure only.

**Corning Natural Gas Corporation**  
**Risk Based Assessment**  
 Systematic Replacement Program  
**Risk Based Assessment Ranking Record**

Date \_\_\_\_\_

Review By \_\_\_\_\_

Segment Description \_\_\_\_\_

Description	Rank
<b>Leak History</b> Five leaks within any continuous 500 foot segment of pipe or; Three leaks in three years      7 Three to four leaks within any continuous 500 foot segment of pipe      5 One to two leaks within any continuous 500 foot segment of pipe      3	
<b>Facility Material</b> Bare steel Installed between 1950 – 1960      4 Threaded and Coupled      3 Other Bare Steel      2 Coated Steel      1	
<b>Population Density</b> Class 4 Location      7 Class 3 Location      5 Class 2 Location      2 Class 1 Location      1	
<b>Facility cover</b> Hard – Asphalt, concrete, etc.      2 Soft – dirt, grass, etc.      1	
<b>Operation issues</b> Water-offs, freeze-offs, leak complaints      1 Not Applicable      0	
<b>System Enhancement</b> Pressure increase due to system load increase      2 Convert from low to medium, Reduce from two mains to one in a street      1 Not Applicable      0	
<b>Municipal Requirements</b> Repaving projects, other infrastructure replacement      1 Not Applicable      0	
<b>Total</b>	

**STAFF OF THE DEPARTMENT OF PUBLIC SERVICE**  
**INTERROGATORY/DOCUMENT REQUEST**

**Corning Natural Gas Corporation**  
**Case 16-G-0369**  
**Gas Rates**

**Request No.:** DPS-236 GSP-8  
**Requested By:** Gas Safety Panel  
**Requested of:** Matt Cook  
**Date of Request:** July 21, 2016  
**Response Due Date:** July 31, 2016  
**Subject:** Leak Prone Pipe

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Please describe what material types are included within the Company's definition of leak prone pipe.

Response: Material types included in Corning's definition of Leak Prone Pipe are Bare Unprotected, Bare Protected and Coated Unprotected Steel Pipe.

Name of Respondent: Matt Cook  
Position of Respondent: Vice President, Operations  
Date of Response: July 29, 2016

**STAFF OF THE DEPARTMENT OF PUBLIC SERVICE**  
**INTERROGATORY/DOCUMENT REQUEST**

**Corning Natural Gas Corporation**  
**Case 16-G-0369**  
**Gas Rates**

**Request No.:** DPS-266 GSP-7  
**Requested By:** Gas Safety Panel  
**Information Requested of:** Matt Cook  
**Date of Request:** August 11, 2016  
**Response Due Date:** August 22, 2016  
**Subject:** Gas Safety: Fire Department Natural Gas Training

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Regarding training provided to fire department first responders, provide the following information. Provide information on both volunteer and career fire companies (if applicable).

1. A list of all counties that are included in Corning's service territory.

Response:

Steuben County, Chemung County and Cortland County.

2. A list of all training facilities in those counties where the utility can provide hands-on training and/or perform drills with either volunteer or career firefighters. Specify whether or not these facilities are owned and operated by Corning or by another entity. If another entity, provide the name of such entity.

Response:

There are no Corning-owned or known private training facilities within the Company's service territory where the Company could provide hands-on training or perform drills with volunteer or career firefighters. All training that is provided to the Fire Departments in the Company's territory is performed in the local Fire Station training facilities.

3. How often does Corning perform drills with fire companies?

Response:

Corning does not yet have the necessary resources to perform actual drills (emergency response/fire response) with its local fire companies. As an alternative, the Company offers annual training to groups of fire departments. For those that accept Corning's offer the Company provides a 2-3 hour training session regarding natural gas safety, emergency response and gas facility knowledge. Each year the Company offers this training to a different group of departments.

4. How often does Corning provide hands-on training with fire companies?

Response:

As stated previously, due to limited resources, the Company is unable to perform hands-on training with fire companies. Nevertheless, Corning has taken steps to improve its internal training program. The Company has recently added a new Training Supervisor. Corning made the Trainer a separate position so that this individual can concentrate on training and safety. Doing so has allowed this Trainer to achieve improvements in the Company's OQ, skills training and QA/QC program. In order to be able to begin to provide hands-on training to Company employees, improved Fire Department training, and Consumer Education programs, Corning will need to increase the numbers of Trainers in this Department. A single additional Trainer now allows the Company to begin development and utilization of these hands-on programs. Additional training personnel and improved training facilities will be necessary to enhance the Corning training program.

Name of Respondent: Matt J. Cook

Position of Respondent: Vice President – Operations

Date of Response: August 31, 2016

**STAFF OF THE DEPARTMENT OF PUBLIC SERVICE  
INTERROGATORY/DOCUMENT REQUEST**

**Corning Natural Gas Corporation  
Case 16-G-0369  
Gas Rates**

**Request No.:** DPS-309  
**Requested By:** Gas Safety Panel  
**Information Requested of:** Matt Cook  
**Date of Request:** September 8, 2016  
**Response Due Date:** September 19, 2016  
**Subject:** Gas Safety: Average Number of Leaks Per Mile of Leak-Prone Main

Provide the following for each calendar year from 2011 through 2015:

- a. The average number of leaks discovered per mile of leak-prone main.
- b. The average number of leak repairs per mile of leak-prone main.
- c. The average number of leaks in year-end backlog per mile of leak-prone main.

Response to a, b and c:

Please see the following table.

<b>Year</b>	<b>Leaks Discovered/mile LPP</b>	<b>Leak Repairs/mile LPP</b>	<b>Leaks in Back-log/mile LPP</b>
2011	1.94	1.68	2.62
2012	1.09	1.81	2.20
2013	1.19	1.83	1.80
2014	0.96	2.05	1.81
2015	2.96	3.50	1.17

Name of Respondent: Matt J. Cook  
Position of Respondent: Vice President – Operations  
Date of Response: September 22, 2016

**STAFF OF THE DEPARTMENT OF PUBLIC SERVICE**  
**INTERROGATORY/DOCUMENT REQUEST**

**Corning Natural Gas Corporation**  
**Case 16-G-0369**  
**Gas Rates**

**Request No.:** DPS-314  
**Requested By:** Gas Safety Panel  
**Information Requested of:** Matt Cook  
**Date of Request:** September 9, 2016  
**Response Due Date:** September 19, 2016  
**Subject:** Gas Safety: 1950 Vintage Pipes

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Commission order in Case 11-G-0280 required Corning to perform annual leakage surveys on its 1950s vintage pipe with manufacturing defects, until such pipe is removed from the system or the Commission determines that such frequency of survey is no longer required. Corning was also required to complete its annual leakage survey no later than November 15 of each calendar year, and beginning December 2012, file a report with a complete analysis to the Commission no later than December 1 of each calendar year.

With regard to the above statement provide the following information:

1. The results of leakage survey performed on 1950s vintage pipes for the period January 1 through August 31, 2016.

Response:

As of August 31, 2016, the 1950s vintage pipe leakage survey was approximately 50% complete and on schedule to be completed by November 15, 2016. To date, one Type 3 leak has been found on the 1950s vintage pipe during the leak survey.

2. A breakdown of the remaining inventory of 1950s vintage (mains and related services) by material type and diameter, as of December 31<sup>st</sup> 2015.

Response:

Corning has 1950s vintage pipe within its distribution system operating at low and medium pressure. This pipe, shown in the following table, is bare unprotected steel and is mostly small diameter. This distribution pipe has been found to contain a longitudinal seam that separates with age and the onset of corrosion. This is the material that the Company is surveying annually and is replacing as part of the Company's replacement program.

Some of Corning's High Pressure Distribution mains were installed in the 1950s. However these pipes are coated, protected and do not exhibit the same issues as the smaller distribution facilities. Because they are high pressure lines, they are leak surveyed/patrolled annually and, with the exception of Line 15, are not under a replacement program.

<b>Diameter</b>	<b>Length (miles)</b>	<b>Material Type</b>
≤ 1 ¼"	0.48	Plain end bare steel
2"	0.56	Threaded & Coupled
2"	2.05	Plain end bare steel
3"	0.19	Threaded & Coupled
3"	3.95	Plain end bare steel
4"	0.17	Threaded & Coupled
4"	7.16	Plain end bare steel
5"	0.089	Plain end bare steel
6"	5.02	Plain end bare steel
8"	1.28	Plain end bare steel
10"	1.20	Plain end bare steel
12"	0.11	Plain end bare steel

The Company has approximately 491 services supplied by the mains shown above. Sizes range from ¾" to 1 ¼" and the material is mostly threaded and coupled bare steel.

3. A timeline/schedule in which the 1950s vintage pipes will be completely replaced.

Response:

The 1950s vintage pipe is being replaced at a rate of approximately 5% per year.

Name of Respondent: Matt J. Cook

Position of Respondent: Vice President – Operations

Date of Response: September 22, 2016

HIGH RISK SECTIONS PART 255		
ACTIVITY TITLE	CODE SECTION	RISK FACTOR
Material - General	255.53(a),(b),(c)	HIGH
Transportation of Pipe	255.65	HIGH
Pipe Design - General	255.103	HIGH
Design of Components - General Requirements	255.143	HIGH
Design of Components - Flexibility	255.159	HIGH
Design of Components - Supports and anchors	255.161	HIGH
Compressor Stations: Emergency shutdown	255.167	HIGH
Compressor Stations: Pressure limiting devices	255.169	HIGH
Compressor Stations: Ventilation	255.173	HIGH
Valves on pipelines to operate at 125 psig or more	255.179	HIGH
Distribution line valves	255.181	HIGH
Vaults: Structural Design requirements	255.183	HIGH
Vaults: Drainage and waterproofing	255.189	HIGH
Protection against accidental overpressuring	255.195	HIGH
Control of the pressure of gas delivered from high pressure distribution systems	255.197	HIGH
Requirements for design of pressure relief and limiting devices	255.199	HIGH
Required capacity of pressure relieving and limiting stations	255.201	HIGH
Qualification of welding procedures	255.225	HIGH
Qualification of Welders	255.227	HIGH
Protection from weather	255.231	HIGH
Miter Joints	255.233	HIGH
Preparation for welding	255.235	HIGH
Inspection and test of welds	255.241(a),(b)	HIGH
Nondestructive testing-Pipeline to operate at 125 PSIG or more	255.243(a)-(e)	HIGH
Welding inspector	255.244(a),(b),(c)	HIGH
Repair or removal of defects	255.245	HIGH
Joining Of Materials Other Than By Welding - General	255.273	HIGH
Joining Of Materials Other Than By Welding - Copper Pipe	255.279	HIGH
Joining Of Materials Other Than By Welding - Plastic Pipe	255.281	HIGH
Plastic pipe: Qualifying persons to make joints	255.285(a),(b),(d)	HIGH
Notification requirements	255.302	HIGH
Compliance with construction standards	255.303	HIGH
Inspection: General	255.305	HIGH
Inspection of materials	255.307	HIGH
Repair of steel pipe	255.309	HIGH
Repair of plastic pipe	255.311	HIGH
Bends and elbows	255.313(a),(b),(c)	HIGH
Wrinkle bends in steel pipe	255.315	HIGH
Installation of plastic pipe	255.321	HIGH
Underground clearance	255.325	HIGH
Customer meters and service regulators: Installation	255.357(d)	HIGH
Service lines: Installation	255.361(e),(f),(g),(h),(i)	HIGH
Service lines: Location of valves	255.365(b)	HIGH
External corrosion control: Buried or submerged pipelines installed after July 31, 1971	255.455(d),(e)	HIGH
External corrosion control: Buried or submerged pipelines installed before August 1, 1971	255.457	HIGH
External corrosion control: Protective coating	255.461(c)	HIGH
External corrosion control: Cathodic protection	255.463	HIGH
External corrosion control: Monitoring	255.465(a),(e)	HIGH
Internal corrosion control: Design and construction of transmission line	255.476(a),(c)	HIGH
Remedial measures: General	255.483	HIGH
Remedial measures: transmission lines	255.485(a),(b)	HIGH
Strength test requirements for steel pipelines to operate at 125 PSIG or more	255.505(a),(b),(c),(d)	HIGH
General requirements (UPGRADES)	255.553 (a),(b),(c),(f)	HIGH
Upgrading to a pressure of 125 PSIG or more in steel pipelines	255.555	HIGH
Upgrading to a pressure less than 125 PSIG	255.557	HIGH
Conversion to service subject to this Part	255.559(a)	HIGH
General provisions	255.603	HIGH
Operator Qualification	255.604	HIGH
Essentials of operating and maintenance plan	255.605	HIGH
Change in class location: Required study	255.609	HIGH
Damage prevention program	255.614	HIGH
Emergency Plans	255.615	HIGH

Customer education and information program	255.616	HIGH
Maximum allowable operating pressure: Steel or plastic pipelines	255.619	HIGH
Maximum allowable operating pressure: High pressure distribution systems	255.621	HIGH
Maximum and minimum allowable operating pressure: Low pressure distribution systems	255.623	HIGH
Odorization of gas	255.625(a),(b)	HIGH
Tapping pipelines under pressure	255.627	HIGH
Purging of pipelines	255.629	HIGH
Control Room Management	255.631(a)	HIGH
Transmission lines: Patrolling	255.705	HIGH
Leakage Surveys - Transmission	255.706	HIGH
Transmission lines: General requirements for repair procedures	255.711	HIGH
Transmission lines: Permanent field repair of imperfections and damages	255.713	HIGH
Transmission lines: Permanent field repair of welds	255.715	HIGH
Transmission lines: Permanent field repair of leaks	255.717	HIGH
Transmission lines: Testing of repairs	255.719	HIGH
Distribution systems: Leak surveys and procedures	255.723	HIGH
Compressor stations: procedures	255.729	HIGH
Compressor stations: Inspection and testing relief devices	255.731	HIGH
Compressor stations: Additional inspections	255.732	HIGH
Compressor stations: Gas detection	255.736	HIGH
Pressure limiting and regulating stations: Inspection and testing	255.739(a),(b)	HIGH
Regulator Station Overpressure Protection	255.743(a),(b)	HIGH
Transmission Line Valves	255.745	HIGH
Prevention of accidental ignition	255.751	HIGH
Protecting cast iron pipelines	255.755	HIGH
Replacement of exposed or undermined cast iron piping	255.756	HIGH
Replacement of cast iron mains paralleling excavations	255.757	HIGH
Leaks: Records	255.807(d)	HIGH
Leaks: Instrument sensitivity verification	255.809	HIGH
Leaks: Type 1	255.811(b),(c),(d),(e)	HIGH
Leaks: Type 2A	255.813(b),(c),(d)	HIGH
Leaks: Type 2	255.815(b),(c),(d)	HIGH
Leak Follow-up	255.819(a)	HIGH
High Consequence Areas	255.905	HIGH
Required Elements (IMP)	255.911	HIGH
Knowledge and Training (IMP)	255.915	HIGH
Identification of Potential Threats to Pipeline Integrity and Use of the Threat Identification in an Integrity Program (IMP)	255.917	HIGH
Baseline Assessment Plan( IMP)	255.919	HIGH
Conducting a Baseline Assessment (IMP)	255.921	HIGH
Direct Assessment (IMP)	255.923	HIGH
External Corrosion Direct Assessment (ECDA) (IMP)	255.925	HIGH
Internal Corrosion Direct Assessment (ICDA) (IMP)	255.927	HIGH
Confirmatory Direct Assessment (CDA) (IMP)	255.931	HIGH
Addressing Integrity Issues (IMP)	255.933	HIGH
Preventive and Mitigative Measures to Protect the High Consequence Areas (IMP)	255.935	HIGH
Continual Process of Evaluation and Assessment (IMP)	255.937	HIGH
Reassessment Intervals (IMP)	255.939	HIGH
General requirements of a GDPIM plan	255.1003	HIGH
Implementation requirements of a GDPIM plan.	255.1005	HIGH
Required elements of a GDPIM plan.	255.1007	HIGH
Required report when compression couplings fail.	255.1009	HIGH
Requirements a small liquefied petroleum gas (LPG) operator must satisfy to implement a GDPIM plan	255.1015	HIGH

<b>HIGH RISK SECTIONS PART 261</b>		
Operation and maintenance plan	261.15	HIGH
Leakage Survey	261.17(a),(c)	HIGH
Carbon monoxide prevention	261.21	HIGH
Warning tag procedures	261.51	HIGH
HEFPA Liaison	261.53	HIGH
Warning Tag Inspection	261.55	HIGH
Warning tag: Class A condition	261.57	HIGH
Warning tag: Class B condition	261.59	HIGH

OTHER RISK SECTIONS PART 255		
ACTIVITY TITLE	CODE SECTION	RISK FACTOR
Preservation of records	255.17	OTH
Compressor station: Design and construction	255.163	OTH
Compressor station: Liquid removal	255.165	OTH
Compressor stations: Additional safety equipment	255.171	OTH
Vaults: Accessibility	255.185	OTH
Vaults: Sealing, venting, and ventilation	255.187	OTH
Calorimeter or calorimeter structures	255.190	OTH
Design pressure of plastic fittings	255.191	OTH
Valve installation in plastic pipe	255.193	OTH
Instrument, control, and sampling piping and components	255.203	OTH
Limitations On Welders	255.229	OTH
Quality assurance program	255.230	OTH
Preheating	255.237	OTH
Stress relieving	255.239	OTH
Inspection and test of welds	255.241(c)	OTH
Nondestructive testing-Pipeline to operate at 125 PSIG or more	255.243(f)	OTH
Plastic pipe: Qualifying joining procedures	255.283	OTH
Plastic pipe: Qualifying persons to make joints	255.285(c)(e)	OTH
Plastic pipe: Inspection of joints	255.287	OTH
Bends and elbows	255.313(d)	OTH
Protection from hazards	255.317	OTH
Installation of pipe in a ditch	255.319	OTH
Casing	255.323	OTH
Cover	255.327	OTH
Customer meters and regulators: Location	255.353	OTH
Customer meters and regulators: Protection from damage	255.355	OTH
Customer meters and service regulators: Installation	255.357(a)-(c)	OTH
Customer meter installations: Operating pressure	255.359	OTH
Service lines: Installation	255.361(a), (b), (c), (d)	OTH
Service lines: valve requirements	255.363	OTH
Service lines: Location of valves	255.365(a), (c)	OTH
Service lines: General requirements for connections to main piping	255.367	OTH
Service lines: Connections to cast iron or ductile iron mains	255.369	OTH
Service lines: Steel	255.371	OTH
Service lines: Cast iron and ductile iron	255.373	OTH
Service lines: Plastic	255.375	OTH
Service lines: Copper	255.377	OTH
New service lines not in use	255.379	OTH
Service lines: excess flow valve performance standards	255.381	OTH
External corrosion control: Buried or submerged pipelines installed after July 31, 1971	255.455 (a)	OTH
External corrosion control: Examination of buried pipeline when exposed	255.459	OTH
External corrosion control: Protective coating	255.461(a), (b), (d), (e), (f), (g)	OTH
External corrosion control: Monitoring	255.465 (b)(c)(d)(f)	OTH
External corrosion control: Electrical isolation	255.467	OTH
External corrosion control: Test stations	255.469	OTH
External corrosion control: Test lead	255.471	OTH
External corrosion control: Interference currents	255.473	OTH
Internal corrosion control: General	255.475(a)(b)	OTH
Atmospheric corrosion control: General	255.479	OTH
Atmospheric corrosion control: Monitoring	255.481	OTH
Remedial measures: transmission lines	255.485(c)	OTH
Remedial measures: Pipelines lines other than cast iron or ductile iron lines	255.487	OTH
Remedial measures: Cast iron and ductile iron pipelines	255.489	OTH
Direct Assessment	255.490	OTH
Corrosion control records	255.491	OTH
General requirements (TESTING)	255.503	OTH
Strength test requirements for steel pipelines to operate at 125 PSIG or more	255.505 (e),(h), (i)	OTH
Test requirements for pipelines to operate at less than 125 PSIG	255.507	OTH
Test requirements for service lines	255.511	OTH
Environmental protection and safety requirements	255.515	OTH
Records (TESTING)	255.517	OTH
Notification requirements (UPGRADES)	255.552	OTH
General requirements (UPGRADES)	255.553 (d)(e)	OTH
Conversion to service subject to this Part	255.559(b)	OTH

Change in class location: Confirmation or revision of maximum allowable operating pressure	255.611(a), (d)	OTH
Continuing surveillance	255.613	OTH
Odorization	255.625 (e)(f)	OTH
Pipeline Markers	255.707(a),(c),(d),(e)	OTH
Transmission lines: Record keeping	255.709	OTH
Distribution systems: Patrolling	255.721(b)	OTH
Test requirements for reinstating service lines	255.725	OTH
Inactive Services	255.726	OTH
Abandonment or inactivation of facilities	255.727(b)-(g)	OTH
Compressor stations: storage of combustible materials	255.735	OTH
Pressure limiting and regulating stations: Inspection and testing	255.739 (c), (d)	OTH
Pressure limiting and regulating stations: Telemetering or recording gauges	255.741	OTH
Regulator Station MAOP	255.743 (c)	OTH
Service Regulator - Min.& Oper. Load, Vents	255.744	OTH
Distribution Line Valves	255.747	OTH
Valve maintenance: Service line valves	255.748	OTH
Regulator Station Vaults	255.749	OTH
Caulked bell and spigot joints	255.753	OTH
Reports of accidents	255.801	OTH
Emergency lists of operator personnel	255.803	OTH
Leaks General	255.805 (a), (b), (e), (g), (h)	OTH
Leaks: Records	255.807(a)-(c)	OTH
Type 3	255.817	OTH
Interruptions of service	255.823 (a)-(b)	OTH
Logging and analysis of gas emergency reports	255.825	OTH
Annual Report	255.829	OTH
Reporting safety-related conditions	255.831	OTH
General (IMP)	255.907	OTH
Changes to an Integrity Management Program (IMP)	255.909	OTH
Low Stress Reassessment (IMP)	255.941	OTH
Measuring Program Effectiveness (IMP)	255.945	OTH
Records (IMP)	255.947	OTH
Records an operator must keep	255.1011	OTH

<b>OTHER RISK SECTIONS PART 261</b>		
High Pressure Piping - Annual Notice	261.19	OTH
Warning tag: Class C condition	261.61	OTH
Warning tag: Action and follow-up	261.63(a)-(h)	OTH
Warning Tag Records	261.65	OTH