

**BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

In the Matter of the General Investigation of)
Atmos Energy Corporation Regarding its) Docket No. 17-ATMG-137-GIP
Operations Near Johnson City, Hamilton)
County, Kansas.)

**NOTICE OF FILING OF STAFF'S
REPORT AND RECOMMENDATION**

COMES NOW, the Staff of the State Corporation Commission of the State of Kansas ("Staff" and "Commission," respectively), and files its Report and Recommendation (R&R) dated June 5, 2017, attached hereto and made a part hereof by reference. Staff recommends the Commission approve the additional actions of Atmos Energy Corporation (Atmos) as agreed to by Staff and Atmos as follows:

1) Atmos will lower the pressure alarm set point on the pipeline pressure monitoring system to 220 psig, with a normal operating pressure range of 240 to 250 psig;

2) Atmos will patrol the pipeline route for areas of potential "shallow pipeline depth", such as erosion cuts, and install pipeline markers in those areas to inform the public of the existence of a pipeline in area; and

3) Atmos will organize additional public awareness meetings with the agricultural community in this area of the state to increase awareness of the potential for shallow pipelines in farm fields. The meetings will encourage all those working with tillage equipment to call Kansas811 before beginning any tillage activity in fields with underground pipelines.

Staff will monitor Atmos' completion of the above tasks during the course of routine pipeline safety inspections.

WHEREFORE, Staff submits it's Report and Recommendation for Commission review and consideration, and for such other relief as the Commission deems just and proper.

Respectfully submitted,

/s/ Jason K. Fisher

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Attorney for Commission Staff

**REPORT AND RECOMMENDATION
UTILITIES DIVISION**

TO: Chairman Pat Apple
Commissioner Shari Feist Albrecht
Commissioner Jay Scott Emler

FROM: Dennis Crupper, Natural Gas Pipeline Safety Engineer
Leo M. Haynos, Chief of Gas Operations & Pipeline Safety
Jeff McClanahan, Director of Utilities

DATE: June 05, 2017

SUBJECT: 17-ATMG-137-GIP
In the Matter of the General Investigation of Atmos Energy Corporation
Regarding its Operations Near Johnson City, Hamilton County, Kansas

EXECUTIVE SUMMARY:

On August 20, 2016, a farming related operation damaged a natural gas pipeline operated by Atmos Energy (Atmos) and caused an unintentional release of natural gas in an open farm field outside the city limits of Johnson City. There were no injuries or any property damage associated with the gas release. Because more than 3,000 MCF of gas escaped from the leak and the total of all costs exceeded \$50,000, the pipeline damage is considered to be an incident reportable to the Pipeline and Hazardous Materials Safety Administration (PHMSA). Atmos' 3/27/2017 amended report of the incident is included with this Report as Appendix A. The Commission, under the authority of K.S.A. 66-1,150, assumed jurisdiction of safety oversight for all intrastate natural gas pipelines and is annually certified by PHMSA in that role. As part of the certification, PHMSA requires the Commission to investigate natural gas incidents. A primary objective of the investigation is to minimize the possibility of recurrence and to initiate enforcement action where noncompliance with the safety standards has occurred.

Staff has completed its investigation into this matter and does not believe any violations of pipeline safety regulations occurred related to this incident. During the course of the investigation, however, Staff and Atmos have agreed that Atmos should take additional actions in order to minimize the recurrence of a similar incident on this pipeline.

The recommended additional actions are:

- 1) Atmos will lower the pressure alarm set point on the pipeline pressure monitoring system to 220 psig, with a normal operating pressure range of 240 to 250 psig;
- 2) Atmos will patrol the pipeline route for areas of potential “shallow pipeline depth”, such as erosion cuts, and install pipeline markers in those areas to inform the public of the existence of a pipeline in area; and
- 3) Atmos will organize additional public awareness meetings with the agricultural community in this area of the state to increase awareness of the potential for shallow pipelines in farm fields. The meetings will encourage all those working with tillage equipment to call Kansas811 before beginning any tillage activity in fields with underground pipelines.

Therefore, Staff recommends the Commission order Atmos to implement the three above listed actions. Staff will monitor Atmos’ completion of the above tasks during the course of routine pipeline safety inspections.

BACKGROUND:

PHMSA requires the Commission to investigate natural gas incidents that have resulted in personal injury requiring hospitalization, a fatality, property damage exceeding \$50,000, the release of more than 3,000 MCF of natural gas, and/or other incidents otherwise considered significant by the state agency. In the subject incident, a third party damage to a natural gas pipeline resulted in the release 45,400 MCF of gas at a total reported cost of \$142,260¹.

On 8/31/2016, Atmos was conducting routine maintenance on a distribution pipeline when personnel determined the operating pressure of the pipeline was abnormally low. After completing the maintenance work, Atmos personnel began to conduct a leak survey of the pipeline. A leak was discovered visually in an agricultural field approximately 8,000 feet from the nearest road. The pipeline damage appeared to have been caused by a third party working over the line. Exhibit 1 provides an aerial map indicating the approximate location of the leak.

The pipeline normal operating pressure is 257 psig, with a low pressure alarm set point of 160 psig. After the hit, the line pressure dropped to 218 psig, where it stabilized until the leak was found and repaired.² Atmos reviewed pressure recording data that indicated a pressure drop on the pipeline had occurred on 8/20/2016 at 12:30 PM, which is noted to be the date and time that the leak occurred.³ A copy of the pressure recording is attached as Exhibit 2. Based on the geometry of the hole size and the operating condition of the line, Atmos calculated 45,400 MCF of gas escaped from the pipeline between 8/20/2016 and 8/31/2016.⁴ Because the calculated amount of escaping gas exceeded the PHMSA reportable threshold limit of 3,000 MCF, Atmos notified Staff of the incident and filed an incident report with PHMSA. Atmos’ amended incident report is attached as Appendix A. According to Atmos, a farmer was performing normal agricultural tilling when the farm equipment struck a natural gas pipeline operated by Atmos Energy in a rural area of Hamilton County near Johnson City, Kansas.⁵ Atmos’ investigation

¹ Appendix A, page 1, Part A, line 10; and page 3, Part D, line 2f.

² Appendix A, page 3, Part E, Lines 1 & 2; and Response to Staff Data Requests No. 3 and 8.

³ Appendix A, page 1, Part A, Line 4; and Response to Staff Data Request No. 3.

⁴ Appendix A, page 1, Part A, Line 4; page 2, Part A, Line 17 a & b; and Response to Staff Data Request No. 2.

⁵ Appendix A, page 1, Part A, Lines 5a to 5f; and Response to Staff Data Request No. 3.

after the incident occurred determined the pipeline had a cover depth of three inches at the point where the farm equipment caught the top of the four-inch diameter steel line.⁶ A photo of the damaged line is attached as Exhibit 3.

ANALYSIS:

A primary objective of the investigation activities is to minimize the possibility of recurrence of an abnormal operating condition and to institute enforcement action where probable noncompliance with the safety standards has occurred. Information from 14 data requests has been analyzed to develop a reasonable reconstruction of the events to explain how the unintentional release of natural gas occurred.

Staff's investigation determined three abnormal operating conditions occurred that led to the excavator damage to the pipeline. These three factors include:

- Atmos was unable to recognize the loss of soil cover over the pipeline within the open field due to naturally occurring soil erosion⁷;
- The person that damaged the pipeline was performing normal agricultural tillage and was not aware of the existence of this pipeline buried in this field of operation. Consequently, the excavator was also unaware that his equipment had damaged the pipeline⁸; and
- Atmos was unable to respond to the leak in a timely manner because the low pressure set point on the pipeline monitoring system was not close enough to normal operating pressure to indicate an abnormal operating condition.⁹ This fact and the rural location of the line caused the leak to exist for 11 days¹⁰.

As the result of Staff's and Atmos' investigation into this matter, Atmos has stated they will take the following actions to avoid a similar recurrence of the events that led to these abnormal operating conditions. The proposed action items are:

- 1) Atmos will set the low pressure alarm set point on the pipeline pressure monitoring system to 220 psig, with a normal operating pressure of range of 240 to 250 psig¹¹.
- 2) Atmos will patrol the pipeline route for areas of potential "shallow pipeline depth" such as erosion cuts and install pipeline markers in those areas to inform the public of the existence of a pipeline in area¹²; and
- 3) Atmos will organize additional public awareness meetings with the agricultural community in this area of the state to increase awareness of the potential for shallow pipelines in farm fields. The meetings will encourage all those working with tillage equipment to call Kansas811 before beginning any tillage activity in fields with underground pipelines.¹³

⁶Appendix A, page 6, Part G3, Lines 6, 7, 8 & 9; Page 2 Part B Line 3; Page 2, Part C, Line 3a; and May 22, 2017, Email from D. Shatas (Atmos) to D. Crupper (KCC).

⁷ Response to Staff Data Request No. 12.

⁸ Response to Staff Data Request No. 3; and May 22, 2017, email from D. Shatas (Atmos) to D. Crupper (KCC).

⁹ Response to Staff Data Requests No. 3 and 8.

¹⁰ Response to Staff Data Requests No. 3 and 13.

¹¹ Appendix A, page 3, Part E, Lines 1 & 2; and Response to Staff Data Request No. 8.

¹² Response to Staff Data Requests No. 12 and 14.

¹³ Response to Staff Data Requests No. 12 and 14.

RECOMMENDATION:

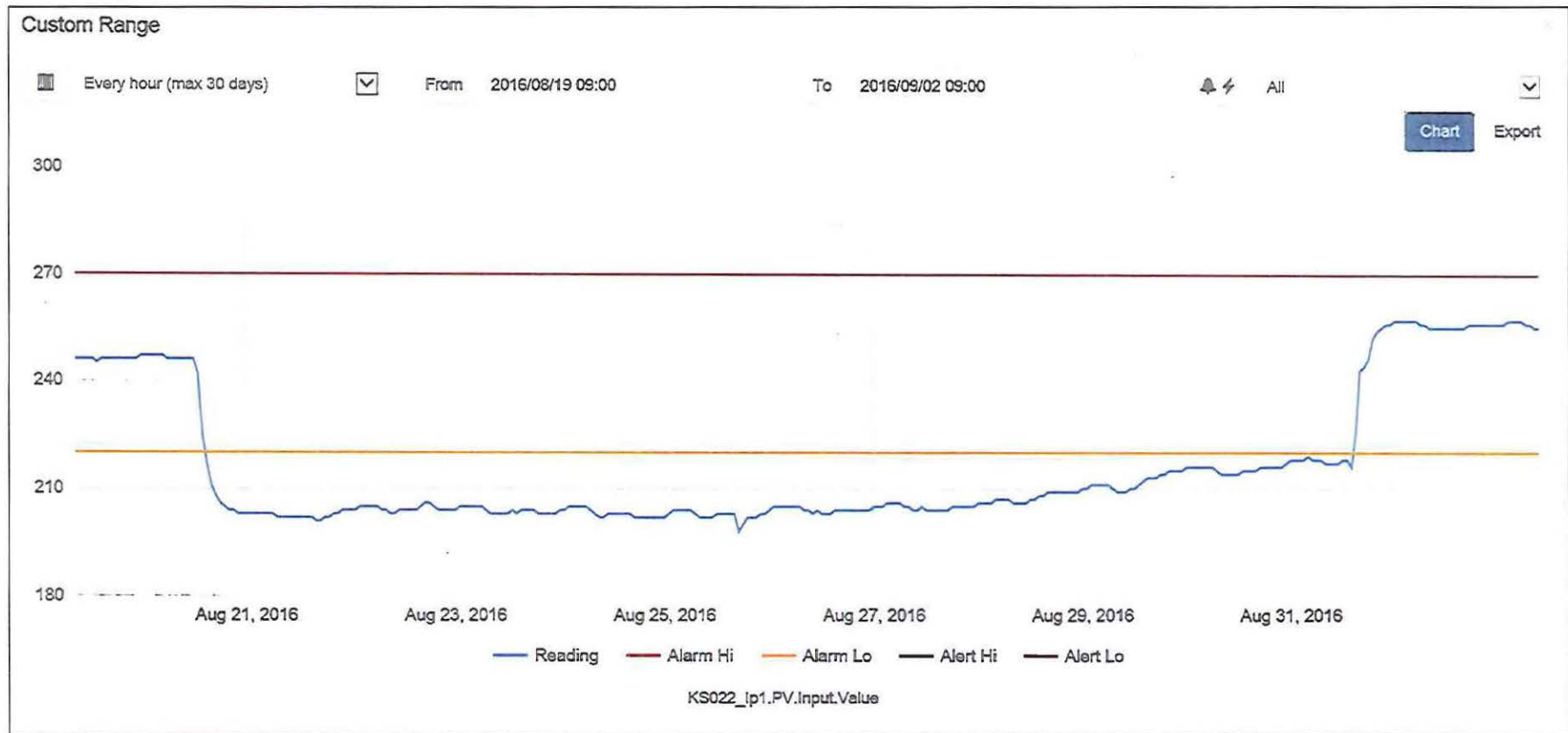
Staff believes the action proposed by Atmos will improve safe operation of natural gas distribution pipelines in farming communities. Therefore, Staff recommends the Commission order Atmos to implement the three above listed actions and close this Docket. Staff will monitor Atmos' completion of the above tasks during the course of routine pipeline safety inspections.

Exhibit 1



Aerial photo of rural Hamilton County south of Syracuse, Kansas. Photo indicates layout of 4 inch steel gas main, shut off valving and location of mechanical puncture.

Exhibit 2



Graph indicating 4 inch gas main operating pressure in psig verses time for the period of Aug. 21, 2016 thru August 31, 2016.

Exhibit 3



Photo taken by Atmos personnel showing orientation and size of mechanical puncture of 4 inch gas main.

KCC Docket 17-ATMG-137-GIP

Appendix A

PHMSA Incident Report 16519 dated 3/27/2017

9 pages

NOTICE: This report is required by 49 CFR Part 191. Failure to report can result in a civil penalty not to exceed 100,000 for each violation for each day that such violation persists except that the maximum civil penalty shall not exceed \$1,000,000 as provided in 49 USC 60122.		OMB NO: 2137-0522 EXPIRATION DATE: 10/31/2017	
 U.S Department of Transportation Pipeline and Hazardous Materials Safety Administration	Original Report Date:	09/26/2016	
	No.	20160096- 16519	
	(DOT Use Only)		
INCIDENT REPORT - GAS DISTRIBUTION SYSTEM			
A federal agency may not conduct or sponsor, and a person is not required to respond to, nor shall a person be subject to a penalty for failure to comply with a collection of information subject to the requirements of the Paperwork Reduction Act unless that collection of information displays a current valid OMB Control Number. The OMB Control Number for this information collection is 2137-0522. All responses to this collection of information are mandatory. Send comments regarding the burden or any other aspect of this collection of information, including suggestions for reducing the burden to: Information Collection Clearance Officer, PHMSA, Office of Pipeline Safety (PHP-30) 1200 New Jersey Avenue, SE, Washington, D.C. 20590.			
INSTRUCTIONS <i>Important: Please read the separate instructions for completing this form before you begin. They clarify the information requested and provide specific examples. If you do not have a copy of the instructions, you can obtain one from the PHMSA Pipeline Safety Community Web Page at http://www.phmsa.dot.gov/pipeline/library/forms.</i>			
PART A - KEY REPORT INFORMATION			
Report Type: <i>(select all that apply)</i>	Original:	Supplemental:	Final:
	Yes	Yes	Yes
Last Revision Date	03/27/2017		
1. Operator's OPS-issued Operator Identification Number (OPID):	6720		
2. Name of Operator	ATMOS ENERGY CORPORATION - COLORADO/KANSAS		
3. Address of Operator:			
3a. Street Address	5430 LBJ FREEWAY SUITE 1800		
3b. City	DALLAS		
3c. State	Texas		
3d. Zip Code	75240		
4. Local time (24-hr clock) and date of the Incident:	08/20/2016 12:30		
5. Location of Incident:			
5a. Street Address or location description	Approximate intersection of Road 30 and Road I		
5b. City	Not Within a Municipality		
5c. County or Parish	Hamilton		
5d. State:	Kansas		
5e. Zip Code:	67878		
5f. Latitude:	37.85146		
Longitude:	-101.8998325		
6. National Response Center Report Number:	1158594		
7. Local time (24-hr clock) and date of initial telephonic report to the National Response Center:	09/09/2016 14:51		
8. Incident resulted from:	Unintentional release of gas		
9. Gas released:	Natural Gas		
	- Other Gas Released Name:		
10. Estimated volume of gas released - Thousand Cubic Feet (MCF):	45,420.000		
11. Were there fatalities?	No		
- If Yes, specify the number in each category:			
11a. Operator employees			
11b. Contractor employees working for the Operator			
11c. Non-Operator emergency responders			
11d. Workers working on the right-of-way, but NOT associated with this Operator			
11e. General public			
11f. Total fatalities (sum of above)			
12. Were there injuries requiring inpatient hospitalization?	No		
- If Yes, specify the number in each category:			
12a. Operator employees			
12b. Contractor employees working for the Operator			
12c. Non-Operator emergency responders			
12d. Workers working on the right-of-way, but NOT associated with this Operator			
12e. General public			
12f. Total injuries (sum of above)			
13. Was the pipeline/facility shut down due to the incident?	Yes		
- If No, Explain:			
- If Yes, complete Questions 13a and 13b: <i>(use local time, 24-hr clock)</i>			

13a. Local time and date of shutdown:	08/31/2016 15:30
13b. Local time pipeline/facility restarted:	08/31/2016 18:30
- Still shut down? (* Supplemental Report Required)	
14. Did the gas ignite?	No
15. Did the gas explode?	No
16. Number of general public evacuated:	0
17. Time sequence (use local time, 24-hour clock):	
17a. Local time operator identified Incident - effective 10-2014, "Incident" changed to "failure"	08/31/2016 12:15
17b. Local time operator resources arrived on site:	08/31/2016 12:15
PART B - ADDITIONAL LOCATION INFORMATION	
1. Was the Incident on Federal land?	No
2. Location of Incident	Utility Right-of-way / Easement
3. Area of Incident:	Underground
	Specify: Under soil
	If Other, Describe:
	Depth of Cover: 3
4. Did Incident occur in a crossing?	No
- If Yes, specify type below:	
- If Bridge crossing –	
Cased/ Uncased:	
- If Railroad crossing –	
Cased/ Uncased/ Bored/drilled	
- If Road crossing –	
Cased/ Uncased/ Bored/drilled	
- If Water crossing –	
Cased/ Uncased	
Name of body of water (If commonly known):	
Approx. water depth (ft):	
PART C - ADDITIONAL FACILITY INFORMATION	
1. Indicate the type of pipeline system:	Investor Owned
	- If Other, specify:
2. Part of system involved in Incident:	Main
	- If Other, specify:
2a. Year "Part of system involved in Incident" was installed:	Unknown
3. When "Main" or "Service" is selected as the "Part of system involved in Incident" (from PART C, Question 2), provide the following:	
3a. Nominal diameter of pipe (in):	4
3b. Pipe specification (e.g., API 5L, ASTM D2513):	Unknown
3c. Pipe manufacturer:	Unknown
3d. Year of manufacture:	Unknown
4. Material involved in Incident:	Steel
	- If Other, specify:
4a. If Steel, Specify seam type:	Unknown
	None/Unknown?
4b. If Steel, Specify wall thickness (inches):	Unknown
4c. If Plastic, Specify type:	
	- If Other, describe:
4d. If Plastic, Specify Standard Dimension Ratio (SDR):	
	Or wall thickness:
4e. If Polyethylene (PE) is selected as the type of plastic in Part C, Question 4.c:	
- Specify PE Pipe Material Designation Code (i.e. 2406, 3408, etc.)	
	Unknown?
5. Type of release involved :	Mechanical Puncture
- If Mechanical Puncture - Specify Approx size:	
	Approx. size: in. (axial): .60
	in. (circumferential): 1.30
- If Leak - Select Type:	
	- If Other, Describe:
- If Rupture - Select Orientation:	
	- If Other, Describe:
	Approx. size: (widest opening):
	(length circumferentially or axially):
- If Other - Describe:	

PART D - ADDITIONAL CONSEQUENCE INFORMATION	
1. Class Location of Incident :	Class 1 Location
2. Estimated Property Damage :	
2a. Estimated cost of public and non-Operator private property damage paid/reimbursed by the Operator – effective 6-2011, "paid/reimbursed by the Operator" removed	\$ 0
Estimated cost of gas released – effective 6-2011, moved to item 2f	
2b. Estimated cost of Operator's property damage & repairs	\$ 5,000
2c. Estimated cost of Operator's emergency response	\$ 1,000
2d. Estimated other costs	\$ 0
- Describe:	
2e. Property damage subtotal (sum of above)	\$ 6,000
Cost of Gas Released	
2f. Estimated cost of gas released	\$ 136,260
Total of all costs	\$ 142,260
3. Estimated number of customers out of service:	
3a. Commercial entities	0
3b. Industrial entities	0
3c. Residences	0
PART E - ADDITIONAL OPERATING INFORMATION	
1. Estimated pressure at the point and time of the Incident (psig):	218.00
2. Normal operating pressure at the point and time of the Incident (psig):	257.00
3. Maximum Allowable Operating Pressure (MAOP) at the point and time of the Incident (psig):	285.00
4. Describe the pressure on the system relating to the Incident:	Pressure did not exceed MAOP
5. Was a Supervisory Control and Data Acquisition (SCADA) based system in place on the pipeline or facility involved in the Incident?	Yes
- If Yes:	
5a. Was it operating at the time of the Incident?	Yes
5b. Was it fully functional at the time of the Incident?	Yes
5c. Did SCADA-based information (such as alarm(s), alert(s), event(s), and/or volume or pack calculations) assist with the detection of the Incident?	Yes
5d. Did SCADA-based information (such as alarm(s), alert(s), event(s), and/or volume calculations) assist with the confirmation of the Incident?	Yes
6. How was the Incident initially identified for the Operator?	Local Operating Personnel, including contractors
- If Other, Specify:	
6a. If "Controller", "Local Operating Personnel, including contractors", "Air Patrol", or "Ground Patrol by Operator or its contractor" is selected in Question 6, specify.	Operator employee
7. Was an investigation initiated into whether or not the controller(s) or control room issues were the cause of or a contributing factor to the Incident?	No, the Operator did not find that an investigation of the controller(s) actions or control room issues was necessary due to: (provide an explanation for why the Operator did not investigate)
- If "No, the operator did not find that an investigation of the controller(s) actions or control room issues was necessary due to:" (provide an explanation for why the operator did not investigate)	Pressure monitoring point did not reach the low alarm limit
- If Yes, Specify investigation result(s) (select all that apply):	
- Investigation reviewed work schedule rotations, continuous hours of service (while working for the Operator), and other factors associated with fatigue	
- Investigation did NOT review work schedule rotations, continuous hours of service (while working for the Operator), and other factors associated with fatigue	
- Provide an explanation for why not:	
- Investigation identified no control room issues	
- Investigation identified no controller issues	
- Investigation identified incorrect controller action or controller error	
- Investigation identified that fatigue may have affected the controller(s) involved or impacted the involved controller(s) response	
- Investigation identified incorrect procedures	
- Investigation identified incorrect control room equipment operation	
- Investigation identified maintenance activities that affected control room operations, procedures, and/or controller response	

- Investigation identified areas other than those above	
Describe:	
PART F - DRUG & ALCOHOL TESTING INFORMATION	
1. As a result of this Incident, were any Operator employees tested under the post-accident drug and alcohol testing requirements of DOT's Drug & Alcohol Testing regulations?	No
- If Yes:	
1a. How many were tested:	
1b. How many failed:	
2. As a result of this Incident, were any Operator contractor employees tested under the post-accident drug and alcohol testing requirements of DOT's Drug & Alcohol Testing regulations?	No
- If Yes:	
2a. How many were tested:	
2b. How many failed:	
PART G - CAUSE INFORMATION	
Select only one box from PART G in shaded column on left representing the Apparent Cause of the Incident, and answer the questions on the right. Describe secondary, contributing, or root causes of the Incident in the narrative (PART H).	
Apparent Cause:	G3 - Excavation Damage
G1 - Corrosion Failure – only one sub-cause can be picked from shaded left-hand column	
Corrosion Failure Sub-Cause:	
- If External Corrosion:	
1. Results of visual examination:	
- If Other, Specify:	
2. Type of corrosion:	
- Galvanic	
- Atmospheric	
- Stray Current	
- Microbiological	
- Selective Seam	
- Other	
- If Other, Describe:	
3. The type(s) of corrosion selected in Question 2 is based on the following:	
- Field examination	
- Determined by metallurgical analysis	
- Other	
- If Other, Describe:	
4. Was the failed item buried under the ground?	
- If Yes:	
4a. Was failed item considered to be under cathodic protection at the time of the incident?	
- If Yes, Year protection started:	
4b. Was shielding, tenting, or disbonding of coating evident at the point of the incident?	
4c. Has one or more Cathodic Protection Survey been conducted at the point of the incident?	
If "Yes, CP Annual Survey" – Most recent year conducted:	
If "Yes, Close Interval Survey" – Most recent year conducted:	
If "Yes, Other CP Survey" – Most recent year conducted:	
- If No:	
4d. Was the failed item externally coated or painted?	
5. Was there observable damage to the coating or paint in the vicinity of the corrosion?	
6. Pipeline coating type, if steel pipe is involved:	
- If Other, Describe:	
- If Internal Corrosion:	
7. Results of visual examination:	
- If Other, Describe:	
8. Cause of corrosion (select all that apply):	
- Corrosive Commodity	
- Water drop-out/Acid	
- Microbiological	

- Erosion	
- Other	
- If Other, Specify:	
9. The cause(s) of corrosion selected in Question 8 is based on the following: <i>(select all that apply)</i> :	
- Field examination	
- Determined by metallurgical analysis	
- Other	
- If Other, Describe:	
10. Location of corrosion <i>(select all that apply)</i> :	
- Low point in pipe	
- Elbow	
- Drop-out	
- Other	
- If Other, Describe:	
11. Was the gas/fluid treated with corrosion inhibitor or biocides?	
12. Were any liquids found in the distribution system where the incident occurred?	
Complete the following if any Corrosion Failure sub-cause is selected AND the "Part of system involved in incident" (from PART C, Question 2) is Main, Service, or Service Riser.	
13. Date of the most recent Leak Survey conducted	
14. Has one or more pressure test been conducted since original construction at the point of the incident?	
- If Yes:	
Most recent year tested:	
Test pressure:	
G2 – Natural Force Damage – only one sub-cause can be picked from shaded left-handed column	
Natural Force Damage – Sub-Cause:	
- If Earth Movement, NOT due to Heavy Rains/Floods:	
1. Specify:	
- If Other, Specify:	
- If Heavy Rains/Floods:	
2. Specify:	
- If Other, Specify:	
- If Lightning:	
3. Specify:	
- If Temperature:	
4. Specify:	
- If Other, Specify:	
- If Other Natural Force Damage:	
5. Describe:	
Complete the following if any Natural Force Damage sub-cause is selected.	
6. Were the natural forces causing the incident generated in conjunction with an extreme weather event?	
6.a If Yes, specify <i>(select all that apply)</i> :	
- Hurricane	
- Tropical Storm	
- Tornado	
- Other	
- If Other, Specify:	
G3 – Excavation Damage – only one sub-cause can be picked from shaded left-hand column	
Excavation Damage – Sub-Cause:	Excavation Damage by Third Party
- If Previous Damage due to Excavation Activity: Complete the following ONLY IF the "Part of system involved in incident" (from Part C, Question 2) is Main, Service, or Service Riser.	
1. Date of the most recent Leak Survey conducted	
2. Has one or more pressure test been conducted since original construction at the point of the incident?	
- If Yes:	
Most recent year tested:	
Test pressure:	
Complete the following if Excavation Damage by Third Party is selected.	
3. Did the operator get prior notification of the excavation activity?	No

3a. If Yes, Notification received from: <i>(select all that apply)</i> :	
- One-Call System	
- Excavator	
- Contractor	
- Landowner	
Complete the following mandatory CGA-DIRT Program questions if any Excavation Damage sub-cause is selected.	
4. Do you want PHMSA to upload the following information to CGA-DIRT (www.cga-dirt.com)?	No
5. Right-of-Way where event occurred <i>(select all that apply)</i> :	
- Public	
- If Public, Specify:	
- Private	
- If Private, Specify:	
- Pipeline Property/Easement	
- Power/Transmission Line	
- Railroad	
- Dedicated Public Utility Easement	
- Federal Land	
- Data not collected	Yes
- Unknown/Other	
6. Type of excavator :	Farmer
7. Type of excavation equipment :	Farm Equipment
8. Type of work performed :	Agriculture
9. Was the One-Call Center notified?	No
9a. If Yes, specify ticket number:	
9b. If this is a State where more than a single One-Call Center exists, list the name of the One-Call Center notified:	
10. Type of Locator:	
11. Were facility locate marks visible in the area of excavation?	
12. Were facilities marked correctly?	
13. Did the damage cause an interruption in service?	No
13a. If Yes, specify duration of the interruption:	
14. Description of the CGA-DIRT Root Cause <i>(select only the one predominant first level CGA-DIRT Root Cause and then, where available as a choice, the one predominant second level CGA-DIRT Root Cause as well)</i> :	
- Root Cause Description:	Other
- If One-Call Notification Practices Not Sufficient, specify:	
- If Locating Practices Not Sufficient, specify:	
- If Excavation Practices Not Sufficient, specify:	
- If Other/None of the Above, explain:	No One-Call notification coupled with shallow main
G4 - Other Outside Force Damage - only one sub-cause can be selected from the shaded left-hand column	
Other Outside Force Damage – Sub-Cause:	
- If Damage by Car, Truck, or Other Motorized Vehicle/Equipment NOT Engaged in Excavation:	
1. Vehicle/Equipment operated by:	
- If Damage by Boats, Barges, Drilling Rigs, or Other Maritime Equipment or Vessels Set Adrift or Which Have Otherwise Lost Their Mooring:	
2. Select one or more of the following IF an extreme weather event was a factor:	
- Hurricane	
- Tropical Storm	
- Tornado	
- Heavy Rains/Flood	
- Other	
- If Other, Specify:	
- If Previous Mechanical Damage NOT Related to Excavation: Complete the following ONLY IF the "Part of system involved in Incident" (from Part C, Question 2) is Main, Service, or Service Riser.	
3. Date of the most recent Leak Survey conducted:	
4. Has one or more pressure test been conducted since original construction at the point of the Incident?	
- If Yes:	
Most recent year tested:	
Test pressure (psig):	
- If Intentional Damage:	
5. Specify:	
- If Other, Specify:	
- If Other Outside Force Damage:	

6. Describe:	
G5 - Pipe, Weld, or Joint Failure - only one sub-cause can be selected from the shaded left-hand column	
Pipe, Weld or Joint Failure – Sub-Cause:	
- If Body of Pipe:	
1. Specify:	
	- If Other, Describe:
- If Butt Weld:	
2. Specify:	
	- If Other, Describe:
- If Fillet Weld:	
3. Specify:	
	- If Other, Describe:
- If Pipe Seam:	
4. Specify:	
	- If Other, Describe:
- If Mechanical Fitting:	
5. Specify the mechanical fitting involved:	
	- If Other, Describe:
6. Specify the type of mechanical fitting:	
	- If Other, Describe:
7. Manufacturer:	
8. Year manufactured:	
9. Year Installed:	
10. Other attributes:	
11. Specify the two materials being joined:	
11a. First material being joined:	
	- If Other, Specify:
11b. If Plastic, specify:	
	- If Other Plastic, specify:
11c. Second material being joined:	
	- If Other, Specify:
11d. If Plastic, specify:	
	- If Other Plastic, Specify:
12. If used on plastic pipe, did the fitting – as designed by the manufacturer – include restraint?	
12a. If Yes, specify:	
- If Compression Fitting:	
13. Fitting type:	
14. Manufacturer:	
15. Year manufactured:	
16. Year installed:	
17. Other attributes:	
18. Specify the two materials being joined:	
18a. First material being joined:	
	- If Other, specify:
18b. If Plastic, specify:	
	- If Other Plastic, specify:
18c. Second material being joined:	
	If Other, specify:
18d. If Plastic, specify:	
	- Other Plastic, specify:
- If Fusion Joint:	
19. Specify:	
	- If Other, Specify:
20. Year installed:	
21. Other attributes:	
22. Specify the two materials being joined:	
22a. First material being joined:	
	- If Other, Specify:
22b. Second material being joined:	
	- If Other, Specify:
- If Other Pipe, Weld, or Joint Failure:	
23. Describe:	

Complete the following if any Pipe, Weld, or Joint Failure sub-cause is selected.	
24. Additional Factors (select all that apply):	
- Dent	
- Gouge	
- Pipe Bend	
- Arc Burn	
- Crack	
- Lack of Fusion	
- Lamination	
- Buckle	
- Wrinkle	
- Misalignment	
- Burnt Steel	
- Other	
	- If Other, Specify:
25. Was the Incident a result of:	
- Construction defect	
	Specify:
- Material defect	
	Specify:
	- If Other, Specify:
- Design defect	
- Previous damage	
26. Has one or more pressure test been conducted since original construction at the point of the Incident?	
- If Yes:	
	Most recent year tested:
	Test pressure:
G6 - Equipment Failure - only one sub-cause can be selected from the shaded left-hand column	
Equipment Failure – Sub-Cause:	
- If Malfunction of Control/Relief Equipment:	
1. Specify:	
- Control Valve	
- Instrumentation	
- SCADA	
- Communications	
- Block Valve	
- Check Valve	
- Relief Valve	
- Power Failure	
- Stopple/Control Fitting	
- Pressure Regulator	
- Other	
	- If Other, Specify:
- If Threaded Connection Failure:	
2. Specify:	
	- If Other, Specify:
- If Non-threaded Connection Failure:	
3. Specify:	
	- If Other, Specify:
- If Valve:	
4. Specify:	
	- If Other, Specify:
4a. Valve type:	
4b. Manufactured by:	
4c. Year manufactured:	
- If Other Equipment Failure:	
5. Describe:	
G7 - Incorrect Operation - only one sub-cause can be selected from the shaded left-hand column	
Incorrect Operation Sub-Cause:	
- If Other Incorrect Operation:	
1. Describe:	

Complete the following if any Incorrect Operation sub-cause is selected.	
2. Was this Incident related to: (select all that apply)	
- Inadequate procedure	
- No procedure established	
- Failure to follow procedure	
- Other	
- If Other, Describe:	
3. What category type was the activity that caused the Incident:	
4. Was the task(s) that led to the Incident identified as a covered task in your Operator Qualification Program?	
4a. If Yes, were the individuals performing the task(s) qualified for the task(s)?	
G8 - Other Incident Cause - only one sub-cause can be selected from the shaded left-hand column	
Other Incident Cause – Sub-Cause:	
- If Miscellaneous:	
1. Describe:	
- If Unknown:	
2. Specify:	
PART H - NARRATIVE DESCRIPTION OF THE INCIDENT	
Farmer damaged main with a root cutting implement in a remote area where water runoff caused main to become shallow. The farmer was not aware of the damage, therefore did not report to the utility. Several days later, company crews were in process of repairing a leak on the same line when the pressure was discovered to be lower than normal, but higher than the low alarm limit of the remote pressure monitors. The operator personnel then began investigating and found the location of the damage. Valves were utilized to shut down a short section of main being fed from 2 directions, which allowed the damage to be repaired.	
PART I - PREPARER AND AUTHORIZED SIGNATURE	
Preparer's Name	Douglas Shatas
Preparer's Title	Compliance Manager
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Preparer's E-mail Address	doug.shatas@atmosenergy.com
Preparer's Facsimile Number	
Authorize Signature's Name	Douglas Shatas
Authorized Signature's Title	Manager of Compliance
Authorized Signature's Email Address	doug.shatas@atmosenergy.com

CERTIFICATE OF SERVICE

17-ATMG-137-GIP

I, the undersigned, certify that a true and correct copy of the above and foregoing Notice of Filing of Staff's Report and Recommendation was served via electronic service this 9th day of June, 2017, to the following:

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