

## PENALTY CALCULATION WORKSHEET

**Docket:** PS11-003  
**Operator:** MDU  
**Date Prepared:** December 19, 2011  
**Prepared by:** Nathan Solem

**Violations:** PAPE Protocol 2.02 & 192.616 d & PAPE Protocol 2.04 & 192.606 c  
Did the messages the operator delivered specifically include provisions to educate the public, emergency officials, local public officials, and excavators on the:  
Use of a one-call notification system prior to excavation and other damage prevention activities;  
Possible hazards associated with unintended releases from a gas, hazardous liquid, or carbon dioxide pipeline facility;  
Physical indications of a possible release;  
Steps to be taken for public safety in the event of a gas, hazardous liquid, or carbon dioxide pipeline release; and  
Procedures to report such an event (to the operator)?  
(Reference: § 192.616 (d); (f); § 195.440 (d), (f))  
Verify all required information was delivered to each of the primary stakeholder audiences.  
Verify the phone number listed on message content is functional and clearly identifies the operator to the caller.  
2.04 Baseline Message Delivery Frequency  
Did the operator's delivery for materials and messages meet or exceed the baseline frequencies specified in API RP 1162, Table 2-1 through Table 2.3? If not, did the operator provide justification in its program or procedural manual?  
(Reference: § 192.616 (c); § 195.440 (c))  
Identify message delivery (using the operator's last five years of records) for the following stakeholder audiences:  
  
Non-customer residents not being covered with all required messages for affected public. Mass media message for 811 is only message they are receiving.

**Total Proposed Penalty:** \$802