



U.S. Department  
of Transportation  
**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue SE  
Washington DC 20590

## 2020 Gas State Program Evaluation

for

New Hampshire PUC/DOE

### Document Legend

#### PART:

- O -- Representative, Dates and Title Information
- A -- Progress Report and Program Documentation Review
- B -- Program Inspection Procedures
- C -- State Qualifications
- D -- Program Performance
- E -- Field Inspections
- F -- Damage prevention and Annual report analysis
- G -- Interstate Agent/Agreement States



# 2020 Gas State Program Evaluation -- CY 2020

Gas

**State Agency:** New Hampshire

**Agency Status:**

**Date of Visit:** 11/01/2021 - 11/05/2021

**Agency Representative:** Randy Knepper, Director, Safety Division  
Bradley Taylor, Gas Inspector

**PHMSA Representative:** Glynn Blanton, PHMSA State Programs

**Commission Chairman to whom follow up letter is to be sent:**

**Name/Title:** Jared Chicoine, Commissioner of Energy

**Agency:** New Hampshire Department of Energy

**Address:** 21 South Fruit Street

**City/State/Zip:** Concord, NH 03301-2429

**Rating:**

**60105(a):** Yes **60106(a):** No **Interstate Agent:** No

## INSTRUCTIONS:

Complete this evaluation in accordance with the Evaluator Guidance for conducting state pipeline safety program evaluations. The evaluation should generally reflect state program performance during CY 2020 (not the status of performance at the time of the evaluation). A deficiency in any one part of a multiple-part question should be scored as "Needs Improvement." Determine the answer to the question then select the appropriate point value. If a state receives less than the maximum points, include a brief explanation in the appropriate notes/comments section. If a question is not applicable to a state, select NA. Please ensure all responses are COMPLETE and ACCURATE, and they OBJECTIVELY reflect the state's program performance for the question being evaluated. Increasing emphasis is being placed on how the state pipeline safety programs conduct and execute their pipeline safety responsibilities (their performance). This evaluation, together with selected factors reported in the state's annual progress report attachments, provide the basis for determining the state's pipeline safety grant allocation.

## Scoring Summary

### PARTS

- A Progress Report and Program Documentation Review
- B Program Inspection Procedures
- C State Qualifications
- D Program Performance
- E Field Inspections
- F Damage prevention and Annual report analysis
- G Interstate Agent/Agreement States

### Possible Points Points Scored

0	0
15	15
10	10
50	50
15	15
10	10
0	0

### TOTALS

<b>100</b>	<b>100</b>
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<b>State Rating .....</b>	<b>100.0</b>
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## PART A - Progress Report and Program Documentation Review

Points(MAX) Score

- 1 Were the following Progress Report Items accurate? (\*items not scored on progress report) Info Only Info Only  
Info Only = No Points
- a. Stats On Operators Data - Progress Report Attachment 1
  - b. State Inspection Activity Data - Progress Report Attachment 2
  - c. List of Operators Data - Progress Report Attachment 3\*
  - d. Incidents/Accidents Data - Progress Report Attachment 4\*
  - e. Stats of Compliance Actions Data - Progress Report Attachment 5\*
  - f. List of Records Kept Data - Progress Report Attachment 6 \*
  - g. Staff and TQ Training Data - Progress Report Attachment 7
  - h. Compliance with Federal Regulations Data - Progress Report Attachment 8
  - i. Performance and Damage Prevention Question Data - Progress Report Attachment 10\*

### Evaluator Notes:

- a. Jurisdictional authority, number of operators and units inspected were found and verified via PHMSA Portal to be correct.
- b. Number of inspection person days 210 meet the minimum requirement of 150. Construction days of 116 meet the 30 required number.
- c. Verification of operators match attachment 1 & 3. No issues.
- d. No incidents reported for CY2020 and was verified in PHMSA Portal. No issues.
- e. Number of carryover violations is zero. Previous year violations of 16 were corrected in CY2020. Seven compliance actions taken and four civil penalties in the amount of \$176,000 assessed and \$218,000 collected.
- f. Extensive list of records provided and all appear to be correct. No issues.
- g. Reviewed TQ training records and verified 2 inspectors have attended all classes to meet the Gas Inspector category. One inspector has attended five of the six required courses. Mr. Bradley needs to attend course 3242 Welding to meet the Gas Inspector requirement. Inspectors: 2-I and 1-III.
- h. Adopted civil penalty amount of \$200,000 to \$2 Million. All federal regulations have been adopted. No issue.
- i. Excellent description and background history was provided in each section. No issues.

Total points scored for this section: 0  
Total possible points for this section: 0



## PART B - Program Inspection Procedures

Points(MAX) Score

- |   |   |   |   |
|---|---|---|---|
| 1 | Do written procedures address pre-inspection, inspection and post inspection activities for each of the following inspection types: Chapter 5.1<br>Yes = 5 No = 0 Needs Improvement = 1-4   | 5 | 5 |
|   | <ul style="list-style-type: none"><li>a. Standard Inspections, which include Drug/Alcohol, CRM and Public Awareness Effectiveness Inspections</li><li>b. TIMP and DIMP Inspections (reviewing largest operator(s) plans annually)</li><li>c. OQ Inspections</li><li>d. Damage Prevention Inspections</li><li>e. On-Site Operator Training</li><li>f. Construction Inspections (annual efforts)</li><li>g. LNG Inspections</li></ul> |   |   |

Evaluator Notes:

- a. Yes, this is listed in Section IV on pages 4-5 of NHPUC Guidelines for Pipeline Safety Inspections.
- b. Yes, this is listed on Section IV on pages 4-5 of NHPUC Guidelines for Pipeline Safety Inspections.
- c. Yes, this is listed in Section IV on pages 4-5 of NHPUC Guidelines for Pipeline Safety Inspections.
- d. Yes, this is listed in Section V on page 11 of NHPUC Guidelines for Pipeline Safety Inspections.
- e. Yes, this is listed in Section V on page 10 of NHPUC Guidelines for Pipeline Safety Inspections.
- f. Yes, this is listed in Section V on page 9 of NHPUC Guidelines for Pipeline Safety Inspections.
- g. Yes, this is listed in Section V on page 8 of NHPUC Guidelines for Pipeline Safety Inspections.

- |   |   |   |   |
|---|---|---|---|
| 2 | Do written procedures address inspection priorities of each operator, and if necessary each unit, based on the following elements and time frames established in its procedures? Chapter 5.1<br>Yes = 4 No = 0 Needs Improvement = 1-3  | 4 | 4 |
|   | <ul style="list-style-type: none"><li>a. Length of time since last inspection</li><li>b. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities)</li><li>c. Type of activity being undertaken by operators (i.e. construction)</li><li>d. Locations of operator's inspection units being inspected - (HCA's, Geographic area, Population Centers, etc.)</li><li>e. Process to identify high-risk inspection units that includes all threats - (Excavation Damage, Corrosion, Natural Forces, Outside Forces, Material and Welds, Equipment, Operators and any Other Factors)</li><li>f. Are inspection units broken down appropriately?</li></ul> |   |   |

Evaluator Notes:

- Yes, this is listed in Section IV, Intervals of Inspection, on page 4 of NHPUC Guidelines for Pipeline Safety Inspections.
- Risk Based inspection process is listed in section VI pages 12-13. A review of inspection units confirm they are broken down correctly. No issues.

- |   |   |   |   |
|---|---|---|---|
| 3 | (Compliance Procedures) Does the state have written procedures to identify steps to be taken from the discovery to resolution of a probable violation? Chapter 5.1<br>Yes = 3 No = 0 Needs Improvement = 1-2  | 3 | 3 |
|   | <ul style="list-style-type: none"><li>a. Procedures to notify an operator (company officer) when a noncompliance is identified</li><li>b. Procedures to routinely review progress of compliance actions to prevent delays or breakdowns</li><li>c. Procedures regarding closing outstanding probable violations</li></ul> |   |   |

Evaluator Notes:

- Yes, this is listed in Section IX, Miscellaneous/General of NHPUC Guidelines for Pipeline Safety Inspections pages 16-20.

- |   |  |   |   |
|---|--|---|---|
| 4 | (Incident/Accident Investigations) Does the state have written procedures to address state actions in the event of an incident/accident?<br>Yes = 3 No = 0 Needs Improvement = 1-2 | 3 | 3 |
|   | <ul style="list-style-type: none"><li>a. Mechanism to receive, record, and respond to operator reports of incidents, including after-hours reports</li></ul>                       |   |   |

- b. If onsite investigation was not made, do procedures require on-call staff to obtain sufficient information to determine the facts to support the decision not to go on-site.

Evaluator Notes:

Yes, this is listed in Section V on pages 6-7 of NHPUC Guidelines for Pipeline Safety Inspections.

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**5 General Comments:**

Info Only Info Only

Info Only = No Points

Evaluator Notes:

No loss of points occurred in this section of the state program evaluation.

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Total points scored for this section: 15  
Total possible points for this section: 15



## PART C - State Qualifications

Points(MAX) Score

- |   |   |   |   |
|---|---|---|---|
| 1 | Has each inspector and program manager fulfilled training requirements? (See Guidelines Appendix C for requirements) Chapter 4.4<br>Yes = 5 No = 0 Needs Improvement = 1-4  | 5 | 5 |
|   | <ul style="list-style-type: none"><li>a. Completion of Required OQ Training before conducting inspection as lead</li><li>b. Completion of Required DIMP/IMP Training before conducting inspection as lead</li><li>c. Completion of Required LNG Training before conducting inspection as lead</li><li>d. Root Cause Training by at least one inspector/program manager</li><li>e. Note any outside training completed</li><li>f. Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector (Reference State Guidelines Section 4.3.1)</li></ul> |   |   |

Evaluator Notes:

Yes a review of TQ Blackboard data confirm two individuals have completed the courses to meet the Gas Inspector qualifications. Additionally they have completed the root cause course. One inspector has completed five of the six required courses. This individual will need to complete the LNG, root cause and control room management courses.

- |   |  |   |   |
|---|--|---|---|
| 2 | Did state records and discussions with state pipeline safety program manager indicate adequate knowledge of PHMSA program and regulations? Chapter 4.1,8.1<br>Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
|---|--|---|---|

Evaluator Notes:

Yes, Randall Knepper has been the program for more than seventeen years. Has completed all required TQ courses and a members of the NARUC Staff Subcommittee on Pipeline Safety.

- |   |  |           |           |
|---|--|-----------|-----------|
| 3 | General Comments:<br>Info Only = No Points | Info Only | Info Only |
|---|--|-----------|-----------|

Evaluator Notes:

No loss of points occurred in this section of the state program evaluation.

Total points scored for this section: 10  
Total possible points for this section: 10



## PART D - Program Performance

Points(MAX) Score

- |   |   |   |   |
|---|---|---|---|
| 1 | Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1<br>Yes = 5 No = 0 Needs Improvement = 1-4  | 5 | 5 |
|   | <ul style="list-style-type: none"><li>a. Standard (General Code Compliance)</li><li>b. Public Awareness Effectiveness Reviews</li><li>c. Drug and Alcohol</li><li>d. Control Room Management</li><li>e. Part 193 LNG Inspections</li><li>f. Construction (did state achieve 20% of total inspection person-days?)</li><li>g. OQ (see Question 3 for additional requirements)</li><li>h. IMP/DIMP (see Question 4 for additional requirements)</li></ul> |   |   |

### Evaluator Notes:

Random generated operators to be checked for this evaluation period consisted of 2 distributions, 1 transmissions, 1 LNG operators and 5 LPG operators. A review of Program Manager's "Operator Spreadsheet" inspections dates for CY2020 provided the type of inspection with inspection date & type. All inspections were performed in accordance to the agency's schedule of at least one inspection not to exceed 60 months. All LNG inspections were found to be performed within a thirty six month period. No issues with time interval of inspections were found.

- |   |   |    |    |
|---|---|----|----|
| 2 | Did inspection form(s) cover all applicable code requirements addressed on Federal Inspection form(s)? Did State complete all applicable portions of inspection forms? Chapter 5.1. Do inspection records indicate that adequate reviews of procedures, records and field activities, including notes and the appropriate level of inspection person-days for each inspection, were performed?<br>Yes = 10 No = 0 Needs Improvement = 1-9 | 10 | 10 |
|   | <ul style="list-style-type: none"><li>a. Standard (General Code Compliance)</li><li>b. Public Awareness Effectiveness Reviews</li><li>c. Drug and Alcohol</li><li>d. Control Room Management</li><li>e. Part 193 LNG Inspections</li><li>f. Construction</li><li>g. OQ (see Question 3 for additional requirements)</li><li>h. IMP/DIMP (see Question 4 for additional requirements)</li></ul>  |    |    |

### Evaluator Notes:

Yes, inspection forms listed on page 4 of the NH PUC Guidelines for Pipeline Safety Inspections covered all sections of the code requirements.

- |   |  |   |   |
|---|--|---|---|
| 3 | Is state verifying monitoring (Protocol 9/Form15) of operators OQ programs? This should include verification of any plan updates and that persons performing covered tasks (including contractors) are properly qualified and requalified at intervals established in the operator's plan. 49 CFR 192 Part N<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

### Evaluator Notes:

Yes, a review of NH Pipeline Inspection Interval Completion spreadsheet and inspection reports found OQ Protocol 9 & Plans were reviewed during the scheduled inspection visits.

- |   |   |   |   |
|---|---|---|---|
| 4 | Is state verifying operator's integrity management Programs (IMP and DIMP)? This should include a review of plans, along with monitoring progress. In addition, the review should take in to account program review and updates of operator's plan(s). 49 CFR 192 Subpart P<br>Yes = 2 No = 0 Needs Improvement = 1   | 2 | 2 |
|   | <ul style="list-style-type: none"><li>a. Are the state's largest operator(s) plans being reviewed annually to ensure they are completing the full cycle of the DIMP/IMP process?</li><li>b. Are states verifying with operators any plastic pipe and components that have shown a record of defects/leaks and mitigating those through DIMP plan?</li></ul> |   |   |

- c. Are the states verifying operators are including low pressure distribution systems in their threat analysis?

Evaluator Notes:

- a. Yes, a review of inspection reports and NH Pipeline Inspection Interval spreadsheet found the state's two largest operators were reviewed annually.  
b. Yes, this is reviewed during the standard inspection.  
c. Yes, all low pressure system sections of Liberty Energy Utilities and Unitil were reviewed. At the direction of the NH PUC they were ordered to review existing procedures regarding the connection of gas mains during replacement for possible improvement to minimize potential confusion or errors in sequencing, documenting and the ability to achieve successful outcomes to outage or other overpressure failures.

5	Did the state review the following (these items are NTSB recommendations to PHMSA that have been deemed acceptable response based on PHMSA reviewing these items during the evaluation process): Chapter 5.1 Yes = 2 No = 0 Needs Improvement = 1	2	2
	<p>a. Operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken;</p> <p>b. Operator procedures for surveillance of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leakage history, or other unusual operating maintenance condition? (Note: See GPTC Appendix G-18 for guidance);</p> <p>c. Operator emergency response procedures for leaks caused by excavation damage near buildings and determine whether the procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings Refer to 4/12/01 letter from PHMSA in response to NTSB recommendation P-00-20 and P-00-21;</p> <p>d. Operator records of previous accidents and failures including reported third-party damage and leak response to ensure appropriate operator response as required by 192.617;</p> <p>e. Directional drilling/boring procedures of each pipeline operator or its contractor to determine if they include actions to protect their facilities from the dangers posed by drilling and other trench less technologies;</p> <p>f. Operator procedures for considering low pressure distribution systems in threat analysis?</p> <p>g. Operator compliance with state and federal regulations for regulators located inside buildings?</p>		

Evaluator Notes:

- a thru g: Yes, this is reviewed during standard inspections.

6	Did the State verify Operators took appropriate action regarding advisory bulletins issued since the last evaluation? (Advisory Bulletins Current Year) Yes = 1 No = 0 Needs Improvement = .5	1	1
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Evaluator Notes:

- Yes, this is reviewed during the standard inspection and meetings with the operator.

7	(Compliance Activities) Did the state follow compliance procedures (from discovery to resolution) and adequately document all probable violations, including what resolution or further course of action is needed to gain compliance? Chapter 5.1 Yes = 10 No = 0 Needs Improvement = 1-9	10	10
	<p>a. Were compliance actions sent to company officer or manager/board member if municipal/government system?</p> <p>b. Were probable violations documented properly?</p> <p>c. Resolve probable violations</p> <p>d. Routinely review progress of probable violations</p> <p>e. Did state issue compliance actions for all probable violations discovered?</p> <p>f. Can state demonstrate fining authority for pipeline safety violations?</p>		



- g. Does Program Manager review, approve and monitor all compliance actions? (note: Program Manager or Senior Official should sign any NOPV or related enforcement action)
- h. Did state compliance actions give reasonable due process to all parties? Including "show cause" hearing, if necessary.
- i. Within 30 days, conduct a post-inspection briefing with the owner or operator outlining any concerns
- j. Within 90 days, to the extent practicable, provide the owner or operator with written preliminary findings of the inspection. (Incident investigations do not need to meet 30/90-day requirement)

Evaluator Notes:

- a. Yes, a review of random selected compliance action letters found inspection reports was mailed to the company officer or manager of the board.
- b. Yes, all probable violations were well documented.
- c. Yes, probable violations were resolved by action by the operator to correct the item(s).
- d. Yes, Program Manager routinely reviews inspection reports and violations on a monthly schedule.
- e. Yes, seven compliance actions were taken in CY2020
- f. Yes, civil penalties in the amount of \$176,000 were assessed in CY2020.
- g. Yes, all compliance action is reviewed and approved by the Program Manager.
- h. Show cause is available to the operator as a option to settlement of the probable violation(s).
- i. Yes, a review of files found a post inspection briefing was being conducted within the 30 days requirement.
- j. Yes, a review of inspection files and reports found this was being met.

8	(Incident Investigations) Were all federally reportable incidents investigated, thoroughly documented, with conclusions and recommendations?	10	10
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Yes = 10 No = 0 Needs Improvement = 1-9

- a. Does state have adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports?
- b. Did state keep adequate records of Incident/Accident notifications received?
- c. If onsite investigation was not made, did the state obtain sufficient information from the operator and/or by means to determine the facts to support the decision not to go on site?
- d. Were onsite observations documented?
- e. Were contributing factors documented?
- f. Were recommendations to prevent recurrences, where appropriate, documented?
- g. Did state initiate compliance action for any violations found during any incident/accident investigation?
- h. Did state assist Region Office or Accident Investigation Division (AID) by taking appropriate follow-up actions related to the operator incident reports to ensure accuracy and final report has been received by PHMSA?
- i. Does state share any lessons learned from incidents/accidents?

Evaluator Notes:

Yes, no accidents occurred during this program evaluation period.

9	Did state respond to Chairman's letter on previous evaluation within 60 days and correct or address any noted deficiencies? (If necessary) Chapter 8.1	1	1
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Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes, Chairwomen Martin letter was received on January 20, 2020 to Zach Barrett, Director, PHMSA State Programs within the required 60 day period.

10	Did State conduct or participate in pipeline safety training session or seminar in Past 3 Years? Chapter 8.5	Info Only	Info Only
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Info Only = No Points

Evaluator Notes:

Did not conduct a pipeline safety seminar in CY2020 due to COVID 19. Last seminar was held in October, 2018.

- 11** Has state confirmed transmission operators have submitted information into NPMS database along with changes made after original submission? Info Only Info Only  
Info Only = No Points

Evaluator Notes:

Yes, the operator is required to notify the NH PUC at the time they updated the information in the NPMS. This requirement only applies to one operator, Liberty Energy.

- 12** Does the state have a mechanism for communicating with stakeholders - other than state pipeline safety seminar? (This should include making enforcement cases available to public). 1 1  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes, this is accomplished by the NH PUC website. The website contains information on seminars, inspection reports, charts on damages and who is causing the damages to underground facilities.

- 13** Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.3 1 1  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

No safety related condition reports were issued. A review of the PDM confirm this information was correct

- 14** Was the State responsive to: 1 1  
Yes = 1 No = 0 Needs Improvement = .5  
a. Surveys or information requests from NAPSR or PHMSA; and  
b. PHMSA Work Management system tasks?

Evaluator Notes:

Yes a review of E-mails found a response was provided by Program Manager. NAPSR survey request: 08-31-20/10-20-20/10-27-20/11-05-20/11-09-20.

- 15** If the State has issued any waivers/special permits for any operator, has the state verified conditions of those waivers/special permits are being met? This should include having the operator amend procedures where appropriate. 1 1  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

No waiver has been issued.

- 16** Were pipeline program files well-organized and accessible? Info Only Info Only  
Info Only = No Points

Evaluator Notes:

Yes, Files were well maintained in their office with information on violations, inspection reports and other relative information.

- 17** Discussion with State on accuracy of inspection day information submitted into State Inspection Day Calculation Tool (SICT). Has the state updated SICT data? 3 3  
Yes = 3 No = 0 Needs Improvement = 1-2

Evaluator Notes:

Yes, they have a excellent understanding on entering the information and using the data for their inspection program. Reviewed the previous SICT numbers and the recently submitted results with Program Managers. No issues.

- 18** Discussion on State Program Performance Metrics found on Stakeholder Communication site.\ <http://primis.phmsa.dot.gov/comm/states.htm?nocache=4805> Info Only Info Only  
Info Only = No Points

Evaluator Notes:

Reviewed the PHMA & NH PUC Data base on damages and other relative information. Damages per 1,000 locate tickets

was lower on the NH PUC data base due to the state's requirements. PHMSA metric is showing a downward trend in damages per 1,000 locate request. The rate is 1.5. No issue.

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- 19** Did the state encourage and promote operator implementation of Pipeline Safety Management Systems (PSMS), or API RP 1173? This holistic approach to improving pipeline safety includes the identification, prevention and remediation of safety hazards. Info Only Info Only

Info Only = No Points

- a. <https://pipelinesms.org/>
- b. Reference AGA recommendation to members May 20, 2019

Evaluator Notes:

Yes, Chris McLaren, PHMSA, presented information about the PSMS program at the NH PUC pipeline safety seminar.

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- 20** General Comments: Info Only Info Only

Info Only = No Points

Evaluator Notes:

No loss of points occurred in this section of the program evaluation review.

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Total points scored for this section: 50  
Total possible points for this section: 50



- 1 Operator, Inspector, Location, Date and PHMSA Representative (enter specifics into the Info Only Info Only comments box below)

Info Only = No Points

- What type of inspection(s) did the state inspector conduct during the field portion of the state evaluation? (i.e. Standard, Construction, IMP, etc)
- When was the unit inspected last?
- Was pipeline operator or representative present during inspection?
- Effort should be made to observe newest state inspector with least experience

Evaluator Notes:

This was a new construction main installation parallel to an existing main. The work was being performed due to the City of Manchester proposed sewer line construction project that would be in conflict with the existing line. Liberty Energy Utilities is the natural gas operator and Midway Utility Contractor was performing the work for Liberty Energy Utilities. This unit was last inspected in the previous week due to other construction projects being conducted in the area. The inspector being observed was Bradley Taylor was recently hired last year.

- 2 Did the inspector use an appropriate inspection form/checklist and was the form/checklist used as a guide for the inspection? (New regulations shall be incorporated) 2 2

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

The inspector took notes, pictures and reviewed calibration dates on equipment used by the contractor firm Midway Utility Company on the plastic fusion and gas reading equipment.

- 3 Did the inspector adequately review the following during the inspection 10 10

Yes = 10 No = 0 Needs Improvement = 1-9

- Procedures (were the inspector's questions of the operator adequate to determine compliance?)
- Records (did the inspector adequately review trends and ask in-depth questions?)
- Field Activities/Facilities (did inspector ensure that procedures were being followed, including ensuring that properly calibrated equipment was used and OQ's were acceptable?)
- Other (please comment)
- Was the inspection of adequate length to properly perform the inspection?

Evaluator Notes:

Yes, Mr. Taylor asked questions and reviewed the Liberty Energy procedures that the contractor was following on the installation and testing of the new main. The 2 inch PE pipe was checked for depth and date of manufacture and fusion of each joint. It was observed Mr. Taylor checking the date/initials/ time of the fusion joints. Review of pressure test flow charts, welder's cards, calibration dates of fusion equipment, operator qualification cards was conducted during the entire day of this construction project.

- 4 From your observation did the inspector have adequate knowledge of the pipeline safety program and regulations? (Evaluator will document reasons if unacceptable) 2 2

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, Mr. Taylor was observed having a good working knowledge of the items to review for compliance to the pipeline safety regulations. Mr. Taylor has recently completed six TQ courses. He has three courses to complete, LNG, Root Cause and Control Room Management

- 5 Did the inspector conduct an exit interview, including identifying probable violations? (If inspection is not totally completed the interview should be based on areas covered during time of field evaluation) 1 1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes, this was conducted immediately at the end of the day with Liberty Utilities supervisor. No areas of concern were found or noted.

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- 6** Was inspection performed in a safe, positive, and constructive manner ? Info Only Info Only  
Info Only = No Points
- a. No unsafe acts should be performed during inspection by the state inspector
  - b. What did the inspector observe in the field? (Narrative description of field observations and how inspector performed)
  - c. Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices)
  - d. Other

Evaluator Notes:

Yes, all safety procedures were following by Mr. Taylor, Midway Utility Contractor and Liberty Energy construction and tapping crews.

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- 7** General Comments: Info Only Info Only  
Info Only = No Points

Evaluator Notes:

No loss of points occurred in this section of the program evaluation.

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Total points scored for this section: 15  
Total possible points for this section: 15



**PART F - Damage prevention and Annual report analysis****Points(MAX) Score**

- |          |  |   |   |
|----------|--|---|---|
| <b>1</b> | Has the state reviewed Operator Annual reports, along with Incident/Accident reports, for accuracy and analyzed data for trends and operator issues.<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

**Evaluator Notes:**

Yes, this annually reviewed by the Program Manager. He reviews the reports for accuracies, errors and performs an analysis of the data. The data is listed on the NH PUC website.

- |          |  |   |   |
|----------|--|---|---|
| <b>2</b> | Has the state verified that the operators analyze excavation damages for the purpose of determining root causes and minimizing the possibility of a recurrence? (192.617)<br>Has the state verified that the operators have appropriately identified excavators who have repeatedly violated one-call laws and damaged their facilities. Have the operators taken steps to mitigate that risks? (192.1007)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

**Evaluator Notes:**

Yes, this information is required to be submitted to NH PUC via their monthly E-26 form.

- |          |  |   |   |
|----------|--|---|---|
| <b>3</b> | Has the state reviewed the operator's annual report pertaining to Part D - Excavation Damage?<br>Yes = 4 No = 0 Needs Improvement = 1-3 <ol style="list-style-type: none"><li>a. Is the information complete and accurate with root cause numbers?</li><li>b. Has the state evaluated the causes for the damages listed under "One-Call Notification Practices Not Sufficient" (Part D.1.a.)?</li><li>c. Has the state evaluated the causes for the damages listed under "Locating Practices Not Sufficient" (Part D.1.b.)? For each operator, does the state review the following?</li><li>d. Is the operator or its locating contractor(s) qualified and following written procedures for locating and marking facilities?</li><li>e. Is the operator appropriately requalifying locators to address performance deficiencies?</li><li>f. What is the number of damages resulting from mismarks?</li><li>g. What is the number of damages resulting from not locating within time requirements (no-shows)?</li><li>h. Is the operator appropriately addressing discovered mapping errors resulting in excavation damages?</li><li>i. Are mapping corrections timely and according to written procedures?</li><li>j. Has the state evaluated the causes for the damages listed under "Excavation Practices Not Sufficient" (Part D.1.c.)?</li></ol> | 4 | 4 |
|----------|--|---|---|

**Evaluator Notes:**

- a thru e. Yes  
f. The number of damages from mismarks in CY2020 was 14.  
g. The number of damages resulting from not locating within time requirements (no-shows) in CY2020 is zero.  
h. Yes, NH operators are required by NH PUC rule 800 Underground Damage Prevention Rule Section 804.01(e)(f) to address mapping errors.  
i. Yes, mapping corrections are required under the NP PUC rule 800 to be made in a timely manner.  
j. Yes, this reviewed in section 805.02.

- |          |   |   |   |
|----------|---|---|---|
| <b>4</b> | Has the agency or another organization within the state collected data and evaluated trends on the number of pipeline damages per 1,000 locate requests?<br>Yes = 2 No = 0 Needs Improvement = 1 <ol style="list-style-type: none"><li>a. What stakeholder group is causing the highest number of damages to the pipelines? Operator, contractor, locating company or public.</li><li>b. Has the state verified the operator is appropriately focusing damage prevention education and training to stakeholders causing the most damages?</li></ol> | 2 | 2 |
|----------|---|---|---|

- c. Has the state evaluated which of the following best describes the reason for the excavation damages; i.e., operator or contractor not following written procedures, failure to maintain marks, failure to support exposed facilities, failure to use hand tools were required, failure to test-hole (pot hole), improper backfilling practices, failure to maintain clearance or insufficient excavation practices.
- d. Has the state verified the operator is appropriately focusing damage prevention education and training to address the causes of excavation damages?

Evaluator Notes:

- a. Excavators are causing the highest number of damages Excavator stakeholder group is road excavator companies in NH doing work for municipal organizations.
- b. Yes, this is required in the operator's procedure manual to address training on stakeholders causing the most damages on their facilities.
- c. Yes, the failure to use hand tools was found to be the reason in NH for excavation damages.
- d. Yes, NH monitors the operators' action in damage prevention, education and training during meetings with the operator or inspections audits.

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**5** General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

No loss of points occurred in this section of the state program evaluation.

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Total points scored for this section: 10  
Total possible points for this section: 10



## PART G - Interstate Agent/Agreement States

Points(MAX) Score

- 1 Were all inspections of interstate pipelines conducted using the Inspection Assistant program for documenting inspections? Info Only Info Only  
Info Only = No Points

Evaluator Notes:

NH PUC does not have a 60106 agreement with PHMSA and not an interstate agent.

- 2 If inspections were conducted independent of a PHMSA team inspection was notice of all identified probable violations provided to PHMSA within 60 days? Info Only Info Only  
Info Only = No Points

Evaluator Notes:

NH PUC does not have a 60106 agreement with PHMSA and not an interstate agent.

- 3 If inspections were conducted independent of a PHMSA team inspection was PHMSA immediately notified of conditions which may pose an immediate safety hazard to the public or environment? Info Only Info Only  
Info Only = No Points

Evaluator Notes:

NH PUC does not have a 60106 agreement with PHMSA and not an interstate agent.

- 4 If inspections were conducted independent of a PHMSA team inspection did the state coordinate with PHMSA if inspections not were not included in the PHMSA Inspection Work Plan? Info Only Info Only  
Info Only = No Points

Evaluator Notes:

NH PUC does not have a 60106 agreement with PHMSA and not an interstate agent.

- 5 Did the state take direction from and cooperate with PHMSA for all incident investigations conducted on interstate pipelines? Info Only Info Only  
Info Only = No Points

Evaluator Notes:

NH PUC does not have a 60106 agreement with PHMSA and not an interstate agent.

- 6 General Comments: Info Only Info Only  
Info Only = No Points

Evaluator Notes:

NH PUC does not have a 60106 agreement with PHMSA and not an interstate agent.

Total points scored for this section: 0  
Total possible points for this section: 0