



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

1200 New Jersey Avenue SE
Washington DC 20590

2022 Hazardous Liquid State Program Evaluation

for

NM PIPELINE SAFETY BUREAU

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



2022 Hazardous Liquid State Program Evaluation -- CY 2022
Hazardous Liquid

State Agency: New Mexico
Agency Status:
Date of Visit: 01/01/1900 - 01/01/1900
Agency Representative: Jason Montoya, Bureau Chief - Pipeline Safety Bureau
PHMSA Representative: Michael Thompson, State Liaison
Commission Chairman to whom follow up letter is to be sent:
Name/Title: Ms Cholla Khoury, Chief of Staff
Agency: New Mexico Public Regulation Commission
Address: 142 W. Palace Avenue
City/State/Zip: Santa Fe, NM 87501

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 2022 (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	Possible Points	Points Scored
A Progress Report and Program Documentation Review	0	0
B Program Inspection Procedures	15	15
C State Qualifications	10	10
D Program Performance	50	50
E Field Inspections	15	15
F Damage prevention and Annual report analysis	6	6
G Interstate Agent/Agreement States	0	0
TOTALS	96	96
State Rating		100.0



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. Reviewed information no issues.
- B. Compared Attachment 2 data with NMPRC inspection records.
- C. Attachment 3 seems to be accurate.
- D. Verified incidents with PDM
- E. Verified compliance actions with NMPRC data and found no issues.
- F. NMPRC keeps electronic records.
- G. Verified staff training and qualifications with TQ Blackboard.
- H. The NMPRC has adopted all required federal regulations. Civil Penalties are \$100,000.00 and \$1,000,000.00
- I. NMPRC listed their performance goals and damage prevention initiatives.

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



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

Evaluator Notes:

- A. Sections 1 and 3, have procedures for how to conduct Standard Inspections
- B. Sections 1 and 3, have procedures for how to conduct IMP Inspections
- C. Sections 1 and 3, have procedures for how to conduct OQ Inspections
- D. Sections 1 and 3, have procedures for how to conduct Damage Prevention Inspections
- E. Sections 1 and 3, have procedures for how to conduct On-Site Operator Training
- F. Sections 1 and 3, have procedures for how to conduct Construction Inspections

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| 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
Yes = 4 No = 0 Needs Improvement = 1-3 | 4 | 4 |
| | <ul style="list-style-type: none"> a. Length of time since last inspection b. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities) c. Type of activity being undertaken by operators (i.e. construction) d. Locations of operator's inspection units being inspected - (HCA's, Geographic area, Population Centers, etc.) 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) f. Are inspection units broken down appropriately? | | |

Evaluator Notes:

- Section 1, VI covers A. Level of compliance from last inspection and town plant (inspection unit) operating history. (i.e., leak history, non-compliance, accidents, etc.)
- B. Length of time since last comprehensive inspection.
- C. Internal and external events affecting the inspection unit such as construction, changes in operator personnel or operating procedures, etc.
- D. Specialized inspections will be conducted as needed or as time permits.
- E. Mergers and Acquisitions
- F. Risk Assessments including: Miles of HCA's, Population Density, and threats such as Poor Leak History, Excavation Damage, Corrosion, Natural Forces, etc. See Policy 10-001 ? Identifying High Risk Inspection Units

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| 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
Yes = 3 No = 0 Needs Improvement = 1-2 | 3 | 3 |
| | <ul style="list-style-type: none"> a. Procedures to notify an operator (company officer) when a noncompliance is identified b. Procedures to routinely review progress of compliance actions to prevent delays or breakdowns c. Procedures regarding closing outstanding probable violations | | |

Evaluator Notes:

- Section 1, VIII has procedures for notifying company/government official of non compliance, procedures which requires to routinely follow up on open compliance actions to avoid breakdowns and procedures on closing outstanding probable violations.

- 4 (Incident/Accident Investigations) Does the state have written procedures to address state actions in the event of an incident/accident? 3 3
 Yes = 3 No = 0 Needs Improvement = 1-2
- a. Mechanism to receive, record, and respond to operator reports of incidents, including after-hours reports
 - 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:

Pipeline Incidents and Accident Investigation procedures are covered in Section 2

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

Evaluator Notes:

NONE

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 4.3 **5** **5**
Yes = 5 No = 0 Needs Improvement = 1-4
- a. Completion of Required OQ Training before conducting inspection as lead
 - b. Completion of Required IMP Training before conducting inspection as lead
 - c. Root Cause Training by at least one inspector/program manager
 - d. Note any outside training completed
 - e. Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector (Reference State Guidelines Section 4.3.1)

Evaluator Notes:

- A. Random inspection reports were reviewed to verify that lead inspectors were qualified.
 - B. IMP lead inspectors have the required training.
 - C. Three inspectors have successfully taken the Root Cause Training course.
 - D. There was no outside training in 2021.
 - E. Reviewed Inspector Training in Black Board verifying Inspectors have obtained qualifications to lead applicable inspections.
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- 2** Did state records and discussions with state pipeline safety program manager indicate adequate knowledge of PHMSA program and regulations? **5** **5**
Yes = 5 No = 0 Needs Improvement = 1-4

Evaluator Notes:

Yes, a review of the states records and discussions with Jason Montoya, (Program Manager) indicate adequate knowledge of the PHMSA program and regulations.

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

Evaluator Notes:

NONE

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



PART D - Program Performance

Points(MAX) Score

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|----------|---|---|---|
| 1 | Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1
Yes = 5 No = 0 Needs Improvement = 1-4 <ol style="list-style-type: none">a. Standard (General Code Compliance)b. Public Awareness Effectiveness Reviewsc. Drug and Alcohold. Control Room Managemente. Construction (did state achieve 20% of total inspection person-days?)f. OQ (see Question 3 for additional requirements)g. IMP (see Question 4 for additional requirements) | 5 | 5 |
|----------|---|---|---|

Evaluator Notes:

A review of the random operators list found that the state could not find record of a previous Standard inspection to the one conducted in 2019 for operator, (3 Bears) All other types of inspections conducted where within the established time intervals in the NMPRC procedures.

This operator idled there line in 2022 but will remain on their inspection schedule.

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| 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?
Yes = 10 No = 0 Needs Improvement = 1-9 <ol style="list-style-type: none">a. Standard (General Code Compliance)b. Public Awareness Effectiveness Reviewsc. Drug and Alcohold. Control Room Managemente. Constructionf. OQ (see Question 3 for additional requirements)g. IMP (see Question 4 for additional requirements) | 10 | 10 |
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Evaluator Notes:

The NMPRC uses PHMSA equivalent forms to conduct inspections. A review of inspections performed for operators on the Random Sample list showed all applicable portions of the inspections were completed.

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| 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 Part 195 Subpart G
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

Yes, the NMPRC conducts OQ inspections using the proper forms to verify operator plans.

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| 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 Part 195 Subpart F & G
Yes = 2 No = 0 Needs Improvement = 1 <ol style="list-style-type: none">a. Are the implementation plans of the state's large/largest operators(s) being reviewed annually to ensure they are completing full cycle of the IMP process? | 2 | 2 |
|----------|---|---|---|

Evaluator Notes:

The state has not verified the operator's integrity management programs annually to insure they are completing a full cycle of the IMP process since the last evaluation. However they have developed a short list of topics to be set as standing agenda items for discussion at their next quarterly meeting with their largest operators.

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| 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 |
| | a. Operator records of previous accidents and failures including reported third-party damage and leak response to ensure appropriate operator response as required by 195.402; and | | |
| | b. 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; | | |

Evaluator Notes:

The NMPRC has an Addendum sheet on the inspection form which include NTSB and ADB questions.

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| 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:

The NMPRC has an Addendum sheet as part of their inspection form which includes NTSB and ADB questions. They are updating it to insure all are covered

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| 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 |
| | a. Were compliance actions sent to company officer or manager/board member if municipal/government system? | | |
| | b. Were probable violations documented properly? | | |
| | c. Resolve probable violations | | |
| | d. Routinely review progress of probable violations | | |
| | e. Did state issue compliance actions for all probable violations discovered? | | |
| | f. Can state demonstrate fining authority for pipeline safety violations? | | |
| | 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:

Yes, reviewed randomly selected inspections to verify compliance action procedures are being followed. The NMPRC properly documents and resolves compliance actions.

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

There were no HL federally reportable incidents in 2022.

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| 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
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

PHMSA evaluation letter received 8/18/2022, Chairman's response mailed on 10/5/2022

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

Last seminar held on 10/26-28/2021 was a Common Ground Alliance seminar where the PM covered pipeline safety issues during the meeting. The state hosted one in April of 2023.

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

Evaluator Notes:

Yes, inspection forms cover the NMPS submittals by operators.

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| 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).
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

Yes, NMPRC website has pipeline safety information and also participate in conferences

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| 13 | Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.7
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

Yes, the NMPRC has worked with PHMSA to clear and close SRCRs and has responded and taken appropriate actions on all active reports.

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

Evaluator Notes:

Yes, the NMPRC responds to PHMSA and NAPS surveys and requests, and does work in the WMS system to keep tasks updated.

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| 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.
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|--|---|---|

Evaluator Notes:



The state has no waivers for HL operators at this time.

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

Evaluator Notes:

Yes, the NMPRC keeps all records electronically

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:

The state is working to make the SICT as accurate an estimate as possible.

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:

New Mexico

State Program Metrics: 2022

Damage Prevention: The numbers have Decreased from 2019 at 3.7 to 3.4 in 2021 and not is up to 3.6 in 2022. What's up and what are you going to do to fix it?

Inspection days per 1000 mile of gas pipe: The number of days has increase from 11.02 in 2018 to 25.09 in 2021.

Inspection Days per MMO/LPG Unit: The number of days has moved up from 0.16 in 2020 to 0.52 in 2021.

Inspection days per 1000 mile of HL pipe: The inspection days for HL pipelines has gone down a little from 110 in 2019 to 87 days in 2020.

Inspector Qualifications: The gas pipeline inspector qualifications have increased in all categories from 2020 to 2021. It is the same with the HL inspector training.

Gas Distribution system leaks: Leak repairs per 100 miles of pipe have gone downward from 2021 to 2022 in total leaks and Hazardous leaks repaired. The number of leaks scheduled for repairs has also stayed the same with 2 in 2021 to 2 in 2022.

Gas pipeline enforcement program evaluation:

The annual gas evaluation score dropped from 100 in 2019 to 92 in 2020. The HL score has been at 100 since 2010.

Incident evaluation Program: Both programs have been at 100 since 2010.

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, they have a question on their addendum form

20 General Comments: Info Only Info Only
Info Only = No Points

Evaluator Notes:

NONE

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



PART E - Field Inspections

Points(MAX) Score

- 1 Operator, Inspector, Location, Date and PHMSA Representative (enter specifics into the comments box below) Info Only Info Only
Info Only = No Points
- a. What type of inspection(s) did the state inspector conduct during the field portion of the state evaluation? (i.e. Standard, Construction, IMP, etc)
 - b. When was the unit inspected last?
 - c. Was pipeline operator or representative present during inspection?
 - d. Effort should be made to observe newest state inspector with least experience

Evaluator Notes:

- A. Control Room Management
- B. 2018
- C. Yes, the operator had representatives present.
- D. Observed Kevin Duke as Lead, with Chris Gutierrez and Antonio Archuleta

-
- 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:

Yes, he use a state modified IA form with updates and additional information.

-
- 3 Did the inspector adequately review the following during the inspection 10 10
Yes = 10 No = 0 Needs Improvement = 1-9
- a. Procedures (were the inspector's questions of the operator adequate to determine compliance?)
 - b. Records (did the inspector adequately review trends and ask in-depth questions?)
 - c. Field Activities/Facilities (did inspector ensure that procedures were being followed, including ensuring that properly calibrated equipment was used and OQ's were acceptable?)
 - d. Other (please comment)
 - e. Was the inspection of adequate length to properly perform the inspection?

Evaluator Notes:

- A. Yes, the inspectors questions were adequate to determine compliance.
- B. Yes
- C. Did observations in the control room and witnessed a shift change.
- D.
- E. Yes, the inspection was of adequate length.

-
- 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, I have observed this inspector in the past and he has demonstrated adequate knowledge of the pipeline safety program and the regulations.

-
- 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, the inspector did a review of activities and findings after the inspection. Theree were several concerns and a PV identified and resolved during the inspection.

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:

- A. No unsafe acts were performed during the inspection.
- B. The inspector observed the operation of the control room and witnessed a change of shift.
- C.
- D.

7 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

NONE

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

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

Evaluator Notes:

The NMPRC review and analyze Annual Report and incident data to risk rank their operators. They also assess an annual pipeline safety fee and require additional information that is reviewed annually. The information is stored as part of the Large Operators reports.

- 2 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) 2 2
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)
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

The NMPRC has enforcement authority over Damage Prevention and conducts investigations of every damage to pipeline facilities reported. The NMPRC tracks repeat offenders thru their enforcement efforts. Repeat offenders are assessed civil penalties in accordance with the states process and procedures.

- 3 Has the state reviewed the operator's annual report pertaining to Part D - Excavation Damage? Info Only Info Only
Info Only = No Points
 - a. Is the information complete and accurate with root cause numbers?
 - b. Has the state evaluated the causes for the damages listed under "One-Call Notification Practices Not Sufficient" (Part D.1.a.)?
 - 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?
 - d. Is the operator or its locating contractor(s) qualified and following written procedures for locating and marking facilities?
 - e. Is the operator appropriately requalifying locators to address performance deficiencies?
 - f. What is the number of damages resulting from mismarks?
 - g. What is the number of damages resulting from not locating within time requirements (no-shows)?
 - h. Is the operator appropriately addressing discovered mapping errors resulting in excavation damages?
 - i. Are mapping corrections timely and according to written procedures?
 - j. Has the state evaluated the causes for the damages listed under "Excavation Practices Not Sufficient" (Part D.1.c.)?

Evaluator Notes:

- A. Yes. Annual report issues discovered during a standard audit are included with that case number assigned by the lead inspector.
- B. Yes. This is a collaborative effort among the PSB, NM811, and New Mexico Regional Common Ground Alliance. The PSB's online reporting system allows for the investigator to select alleged violations consistent with One-Call Notification Practices Not Sufficient.
- C. Yes. This is a collaborative effort among the PSB, NM811, and New Mexico Regional Common Ground Alliance. The PSB's online reporting system allows for the investigator to select alleged violations consistent with Locating Practices Not Sufficient
- D. Generally yes. If a locator fails to comply the PSB expects operators to suspend OQ's, retrain, and requalify.
- E. Yes. This is confirmed during OQ audits.
- F. Yes. DP inspectors are investigating all damages reported and lead inspectors review the data during standard inspections.
- G. Yes. DP inspectors are investigating all damages reported and lead inspectors review the data during standard inspections.
- H. Yes. NM811's membership agreement requires members to update their mapping systems frequently and as needed to include new underground infrastructure.
- I. Generally Yes, Pipeline operators are good at updating maps to maximize their protection from excavation damage. Periodically NM811 staff have to request updated maps.



J. Yes. This is a collaborative effort among the PSB, NM811, and New Mexico Regional Common Ground Alliance. The DUNS: 142199152 2021 Gas State Program Evaluation New Mexico NM PIPELINE SAFETY BUREAU, Page: 15 PSB's online reporting system allows for the investigator to select alleged violations consistent with Excavation Practices Not Sufficient.

- 4 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? 2 2
Yes = 2 No = 0 Needs Improvement = 1
- a. What stakeholder group is causing the highest number of damages to the pipelines? Operator, contractor, locating company or public.
 - b. Has the state verified the operator is appropriately focusing damage prevention education and training to stakeholders causing the most damages?
 - 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:

Yes, this is a collaborative effort amongst NM811, New Mexico Regional Common Ground Alliance, and Pipeline Safety Bureau. Data is submitted to CGA and included in their analysis as well. Contractors continue to be the highest contributor to damages resulting from excavation and the top three remain to be failure to call 811 before digging, failure to maintain marks, failure to maintain 18" tolerance zone with mechanical equipment. All damages are investigated and determined causes are published in NM's 3rd party damage reporting tool, KorInsight.

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

Evaluator Notes:

NONE

Total points scored for this section: 6
Total possible points for this section: 6



PART G - Interstate Agent/Agreement States

Points(MAX) Score

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- 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:

NM PRC is not an interstate agent and does not have a 60106 agreement with PHMSA.

- 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:

NM PRC is not an interstate agent and does not have a 60106 agreement with PHMSA.

- 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:

NM PRC is not an interstate agent and does not have a 60106 agreement with PHMSA.

- 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:

NM PRC is not an interstate agent and does not have a 60106 agreement with PHMSA.

- 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:

NM PRC is not an interstate agent and does not have a 60106 agreement with PHMSA.

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

Evaluator Notes:

NM PRC is not an interstate agent and does not have a 60106 agreement with PHMSA.

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

