



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

1200 New Jersey Avenue SE  
Washington DC 20590

# 2013 Natural Gas State Program Evaluation

for

## NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

### Document Legend

#### PART:

- O -- Representative Date and Title Information
- A -- Progress Report and Program Documentation Review
- B -- Program Inspection Procedures
- C -- Program Performance
- D -- Compliance Activities
- E -- Incident Investigations
- F -- Damage Prevention
- G -- Field Inspections
- H -- Interstate Agent State (If Applicable)
- I -- 60106 Agreement State (If Applicable)

2013 Natural Gas State Program Evaluation -- CY 2013  
Natural Gas

**State Agency:** New Hampshire

**Agency Status:**

**Date of Visit:** 06/23/2014 - 06/27/2014

**Agency Representative:** Randy Knepper, Director Safety Division  
David Burnell, Safety Specialist

**PHMSA Representative:** Glynn Blanton, US DOT/PHMSA State Program

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

**Name/Title:** Amy L. Ignatius, Chairman

**Agency:** New Hampshire Public Utilities Commission

**Address:** 21 South Fruit Street, Suite 10

**City/State/Zip:** Concord, New Hampshire 03301-2429

**Rating:**

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

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**INSTRUCTIONS:**

Complete this evaluation in accordance with the Procedures for Evaluating State Pipeline Safety Program. The evaluation should generally reflect state program performance during CY 2013 (not the status of performance at the time of the evaluation). All items for which criteria have not been established should be answered based on the PHMSA representative's judgment. 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 space provided for general comments/regional observations. If a question is not applicable to a state, select NA. Please ensure all responses are COMPLETE and ACCURATE, and OBJECTIVELY reflect state program performance. Increasing emphasis is being placed on 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.

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**Field Inspection (PART G):**

The field inspection form used will allow different areas of emphasis to be considered for each question. Question 13 is provided for scoring field observation areas. In completing PART G, the PHMSA representative should include a written summary which thoroughly documents the inspection.

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**Scoring Summary**

<b>PARTS</b>		<b>Possible Points</b>	<b>Points Scored</b>
A	Progress Report and Program Documentation Review	9	9
B	Program Inspection Procedures	15	15
C	Program Performance	45	45
D	Compliance Activities	15	15
E	Incident Investigations	3	3
F	Damage Prevention	8	8
G	Field Inspections	12	12
H	Interstate Agent State (If Applicable)	0	0
I	60106 Agreement State (If Applicable)	0	0
<b>TOTALS</b>		<b>107</b>	<b>107</b>
<b>State Rating .....</b>			<b>100.0</b>

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## PART A - Progress Report and Program Documentation Review

Points(MAX) Score

- |   |   |   |   |
|---|---|---|---|
| 1 | Accuracy of Jurisdictional Authority and Operator/Inspection Units Data - Progress Report Attachment 1 (A1a)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|---|---|---|

**Evaluator Notes:**

A review of work papers, files and other related documents confirm the information contained in Attachment 1 was correct. Verified the percentage of inspection units were performed in accordance written procedures and Attachment 1. The number of operators and inspection units match Attachment 3. Only one master meter operator remains in NH. No areas of concern.

- |   |  |   |   |
|---|--|---|---|
| 2 | Review of Inspection Days for accuracy - Progress Report Attachment 2 (A1b)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|--|---|---|

**Evaluator Notes:**

Conducted a review of inspection days per inspector using NH PUC data base and found the number of inspection day totals did not match the number entered on Attachment 2. However, after reviewing work papers we found the information was correct.

As a reminder, if you change any inspection days in the Progress Report after filing the document, please retain your notes and notify Carrie Winslow to request a change be made. Information should be a reflection of the data on December 31.

- |   |  |   |   |
|---|--|---|---|
| 3 | Accuracy verification of Operators and Operators Inspection Units in State - Progress Report Attachment 3 (A1c)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|--|---|---|

**Evaluator Notes:**

We reviewed and compared the list of operators in Attachment 3 to NH PUC's data base. We found the information was correct. In the note section information on the addition and deletion of LPG operator was provided. No issues.

- |   |  |   |    |
|---|--|---|----|
| 4 | Were all federally reportable incident reports listed and information correct? - Progress Report Attachment 4 (A1d)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|---|--|---|----|

**Evaluator Notes:**

No reportable incidents occurred in CY2013. NA

- |   |  |   |   |
|---|--|---|---|
| 5 | Accuracy verification of Compliance Activities - Progress Report Attachment 5 (A1e)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|--|---|---|

**Evaluator Notes:**

Reviewed Attachment 5 data on the number of carryover violations, violations found and corrected during CY2013. Number to be corrected at year end was found correct. Reviewed file folders on Liberty Energy, Northern Utilities and other operators who have a potential civil penalties and determined information was correct on civil penalty assessed and collected. No issues.

- |   |   |   |   |
|---|---|---|---|
| 6 | Were pipeline program files well-organized and accessible? - Progress Report Attachment 6 (A1f, A4)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|---|---|---|

**Evaluator Notes:**

Yes, a review of files, data base and inspection reports found program files were well organized and accessible. No issues.

- |   |  |   |   |
|---|--|---|---|
| 7 | Was employee listing and completed training accurate and complete? - Progress Report Attachment 7 (A1g)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|--|---|---|

**Evaluator Notes:**

A review of SABA transcript and checking training information posted in NH PUC Progress Report found employees listed

and their qualification were correct. Reviewed names listed under Damage Prevention and Administrative Support and found them to be correct. No issues.

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<b>8</b>	Verification of Part 192,193,198,199 Rules and Amendments - Progress Report Attachment 8 (A1h) Yes = 1 No = 0 Needs Improvement = .5	1	1
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Evaluator Notes:

NH PUC Administrative Rule PUC 506.01(a), Pipeline Safety Standards, automatically adopt CFR Parts 191, 192, 193, 198 & 199. No issues.

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<b>9</b>	List of Planned Performance - Did state describe accomplishments on Progress Report in detail - Progress Report Attachment 10 (H1-3) Yes = 1 No = 0 Needs Improvement = .5	1	1
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Evaluator Notes:

Improvements were noted. The program description was more informative about planned and long term goals of pipeline safety program. No issues.

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<b>10</b>	General Comments: Info Only = No Points	Info Only	Info Only
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Evaluator Notes:

No loss of points occurred in this section. NH PUC has generally met the requirements of Part A.

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Total points scored for this section: 9  
Total possible points for this section: 9

## PART B - Program Inspection Procedures

Points(MAX) Score

- |          |  |   |   |
|----------|--|---|---|
| <b>1</b> | Standard Inspections (B1a)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

**Evaluator Notes:**

A review of New Hampshire PUC Guidelines for Pipeline Safety Inspections found this item is listed under Section V. Standard inspections will be performed at least every five years using Federal Form 2. No issues.

- |          |   |   |   |
|----------|---|---|---|
| <b>2</b> | IMP Inspections (including DIMP) (B1b)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

**Evaluator Notes:**

A review of New Hampshire PUC Guidelines for Pipeline Safety Inspections found this item is listed under Section V. Integrity Management Inspections will be performed at least every five years using the Federal form. No issues.

- |          |   |   |   |
|----------|---|---|---|
| <b>3</b> | OQ Inspections (B1c)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

**Evaluator Notes:**

A review of New Hampshire PUC Guidelines for Pipeline Safety Inspections found this item is listed under Section V. Operator Qualification Inspections will be performed at least every five years using the Federal form 14. No issues.

- |          |  |   |   |
|----------|--|---|---|
| <b>4</b> | Damage Prevention Inspections (B1d)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

**Evaluator Notes:**

A review of New Hampshire PUC Guidelines for Pipeline Safety Inspections found this item is listed under Section V. Damage Prevention Inspections will be performed on a limited basis. No issues.

- |          |  |   |   |
|----------|--|---|---|
| <b>5</b> | On-Site Operator Training (B1e)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

**Evaluator Notes:**

A review of New Hampshire PUC Guidelines for Pipeline Safety Inspections found this item is listed under Section V. On-Site Operator Inspections will be performed on a limited basis. No issues.

- |          |   |   |   |
|----------|---|---|---|
| <b>6</b> | Construction Inspections (B1f)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

**Evaluator Notes:**

A review of New Hampshire PUC Guidelines for Pipeline Safety Inspections found this item is listed under Section V. Construction Inspections will be performed on a limited basis using information contained in Federal forms 2 & 5. No issues.

- |          |  |   |   |
|----------|--|---|---|
| <b>7</b> | Incident/Accident Investigations (B1g)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

**Evaluator Notes:**

A review of New Hampshire PUC Guidelines for Pipeline Safety Inspections found this item is listed under Section V. Failure Investigation Inspections will be performed when a federal threshold has been met or in some cases when on site and a release of gas has occurred but ultimately determined to not meet threshold of a federal incident. No issues.

- |          |   |   |   |
|----------|---|---|---|
| <b>8</b> | Does inspection plan address inspection priorities of each operator, and if necessary each unit, based on the following elements? (B2a-d, G1,2,4)<br>Yes = 6 No = 0 Needs Improvement = 1-5 | 6 | 6 |
|----------|---|---|---|

- |  |                                      |                          |   |
|--|--------------------------------------|--------------------------|---|
| a. Length of time since last inspection  | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c. Type of activity being undertaken by operators (i.e. construction)  | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

- d. Locations of operators inspection units being inspected - (HCA's, Geographic areas, Population Density, etc) Yes ☒ No ☐ Needs Improvement ☐
- 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) Yes ☒ No ☐ Needs Improvement ☐
- f. Are inspection units broken down appropriately? Yes ☒ No ☐ Needs Improvement ☐

Evaluator Notes:

A review of New Hampshire PUC Guidelines for Pipeline Safety Inspections found these items are listed under Section 6. Risk Based Inspection Process.

Inspection Risk Criteria spreadsheet shows the following items.

Item a, is located in Inspection Risk Criteria, number 2.

Item b, is located in Inspection Risk Criteria, number 10 thru 14

Item c, is located in Inspection Risk Criteria, number 15

Item d, is located in Inspection Risk Criteria, number 1, 16, 18

Item e, is located in Inspection Risk Criteria, number 17

Item f, this is determined by Program Manager based on each operator.

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**9** General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

No loss of points occurred in this section. NH PUC has generally met the requirements of Part B.

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

**PART C - Program Performance****Points(MAX) Score**

- 1** Was ratio of Total Inspection person-days to total person days acceptable? (Director of State Programs may modify with just cause) Chapter 4.3 (A12) 5 5  
Yes = 5 No = 0

A. Total Inspection Person Days (Attachment 2):  
186.00

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):  
220 X 2.10 = 462.00

Ratio: A / B  
186.00 / 462.00 = 0.40

If Ratio  $\geq$  0.38 Then Points = 5, If Ratio  $<$  0.38 Then Points = 0  
Points = 5

**Evaluator Notes:**

A. Total Inspection Person Days (Attachment 2) = 186

B. Total Inspection Person Days Charged to the program (220\*Number of Inspection person years (Attachment 7) =462

Formula: - Ratio = A/B = 186/462 = 0.4

Rule: - (If Ratio  $\geq$  .38 then points = 5 else Points = 0.)

Thus Points = 5

- 2** Has each inspector and program manager fulfilled the T Q Training Requirements? (See Guidelines for requirements) Chapter 4.4 (A8-A11, G19) 5 5  
Yes = 5 No = 0 Needs Improvement = 1-4

- |    |  |                                      |                          |   |
|----|--|--------------------------------------|--------------------------|---|
| a. | Completion of Required OQ Training before conducting inspection as lead?                                     | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. | Completion of Required DIMP*/IMP Training before conducting inspection as lead? *Effective Evaluation CY2013 | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c. | Root Cause Training by at least one inspector/program manager  | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d. | Note any outside training completed  | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

**Evaluator Notes:**

Yes, David Burnell and Randy Knepper have completed OQ & IMP training before conducting inspections. Joseph Vercellotti, David Burnell & Randy Knepper have completed the Root Cause analysis course. All inspection staff has met the training requirements for the year of this evaluation. Note, Joe Vercellotti is signed up for PL3293, Corrosion Control and PL1245 DIMP in CY2014.

- 3** Did state records and discussions with state pipeline safety program manager indicate adequate knowledge of PHMSA program and regulations? Chapter 4.1,8.1 (A5) 2 2  
Yes = 2 No = 0 Needs Improvement = 1

**Evaluator Notes:**

Yes, Randy Knepper has ten years of experience in pipeline safety. He has served as Chairman NAPSAR and currently is Chairman of the NARUC Staff Subcommittee on Pipeline Safety. No issues.

- 4** 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 (A6-7) 2 2  
Yes = 2 No = 0 Needs Improvement = 1

**Evaluator Notes:**

Yes, Chairman Amy Ignatius response letter was received on October 7, 2013 within the required sixty day time schedule. Chairman Ignatius provided excellent response to the four items mentioned in PHMSA letter dated August 8, 2013.

- 5** Did State hold PHMSA TQ Seminar in Past 3 Years? Chapter 8.5 (A3) 2 2  
Yes = 2 No = 0

**Evaluator Notes:**

Yes, on October 23-24, 2013 NH PUC in conjunction with the New England Pipeline Safety Representatives hosted a TQ

seminar in Manchester, Vermont. The number of attendees was approximately 150 individuals representing the natural gas industry.

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- |          |   |   |   |
|----------|---|---|---|
| <b>6</b> | Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1 (B3)<br>Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
|----------|---|---|---|

Evaluator Notes:

Yes, a review of files and NH PUC written procedures confirm all inspections were scheduled in accordance to the established time intervals listed under Intervals of Inspections described in Section 4. No issues of concern.

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- |          |   |   |   |
|----------|---|---|---|
| <b>7</b> | 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 (B4-5)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

Evaluator Notes:

Yes, NH PUC staff use the federal forms or a version of the inspection forms to perform their inspections. A review of inspection reports found all answers were completed with inspector comments and a check was made on one of the four selected answers.

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- |          |  |   |   |
|----------|--|---|---|
| <b>8</b> | Did the state review operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken? (NTSB) Chapter 5.1 (B7)<br>Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

Evaluator Notes:

Yes, this item is reviewed and checked on NH PUC Form #4 Comprehensive Corrosion and PHMSA Form 2. No issues.

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- |          |   |   |   |
|----------|---|---|---|
| <b>9</b> | Did the state review 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) (NTSB) Chapter 5.1 (B8)<br>Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

Yes, NH PUC requires all operators to submit information on cast iron pipeline pertaining to leakage and condition of pipe. This information is filed monthly and reviewed by staff to determine if the operators are complying with their rules and regulations.

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- |           |  |   |   |
|-----------|--|---|---|
| <b>10</b> | Did the state review 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? (NTSB) Chapter 5.1 (B9)<br>Yes = 1 No = 0 | 1 | 1 |
|-----------|--|---|---|

Evaluator Notes:

Yes, this is reviewed and checked during the standard inspection of the operator using the Federal Form 2. No issues of concern.

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- |           |   |   |   |
|-----------|---|---|---|
| <b>11</b> | Did the state review 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? Chapter 5.1 (B10,E5)<br>Yes = 1 No = 0 | 1 | 1 |
|-----------|---|---|---|

Evaluator Notes:

Yes, staff members review operator's response times of all leaks, odorant complaints or other events requiring an emergency response. This is a requirement under NH PUC Rule number 504.06 and order number 25370.

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|-----------|---|---|---|
| <b>12</b> | Has the state reviewed Operator Annual reports, along with Incident/Accident reports, for accuracy and analyzed data for trends and operator issues? Data Initiative (G6-9,G16)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|---|---|---|



Evaluator Notes:

Yes, NH PUC staff continues to monitor Operator Annual Reports by performing a review of each document when the operator files the report. The information is recorded on a spreadsheet and a review of the results of leaks, cast iron & other items are plotted. No issues.

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- |           |  |   |   |
|-----------|--|---|---|
| <b>13</b> | Did state input all applicable OQ, IMP inspection results into federal database in a timely manner? This includes replies to Operator notifications into IMDB database. Chapter 5.1 (G10-12)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|--|---|---|

Evaluator Notes:

A review of PHMSA Operator Qualification data base found three inspection reports for calendar year 2013 was entered by David Burnell on 06-04-13, 08-23-13 & 10-30-13. A review of IMP data base found one inspection report was filed for calendar year 2010. The operator was KeySpan (now Liberty Utilities) on 12-15-10. No issues of concern.

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- |           |   |   |   |
|-----------|---|---|---|
| <b>14</b> | Has state confirmed intrastate transmission operators have submitted information into NPMS database along with changes made after original submission? (G14)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|---|---|---|

Evaluator Notes:

Yes. Staff members check the submission and updates by operators into the NPMS data base prior to performing inspections. Additionally, emails from operators about their updates are sent to the NH PUC office. A review of an email to Randy Knepper from Liberty Utilities East on February 24, 2014 confirms this answer. No issues.

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- |           |  |   |   |
|-----------|--|---|---|
| <b>15</b> | Is the state verifying operators are conducting drug and alcohol tests as required by regulations? This should include verifying positive tests are responded to in accordance with program. 49 CFR 199 (I1-3)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|--|---|---|

Evaluator Notes:

Yes. This was accomplished during the Liberty Utilities LNG inspection performed by David Burnell on October 18, 2013. Reviewed inspection form and found this item was checked. No issues.

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- |           |  |   |   |
|-----------|--|---|---|
| <b>16</b> | Is state verifying operators OQ programs are up to date? This should include verification of any plan updates and that persons performing covered tasks (including contractors) are properly qualified and requalified at intervals determined in the operators plan. 49 CFR 192 Part N (I4-7)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|--|---|---|

Evaluator Notes:

Yes. NH PUC Rule 506.2(t) requires all operators to file their OQ program. Anytime a change is made in the OQ program by the operator, they are required to file an updated copy of their OQ program.

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- |           |  |   |   |
|-----------|--|---|---|
| <b>17</b> | Is state verifying operator's gas transmission integrity management programs (IMP) are up to date? This should include a previous review of IMP plan, along with monitoring progress on operator tests and remedial actions. In addition, the review should take in to account program review and updates of operators plan(s). 49 CFR 192 Subpart O (I8-12)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|--|---|---|

Evaluator Notes:

Yes. NH PUC Rule 506.2(t) requires all operators to file their IMP program. Anytime a change is made in the IMP program by the operator, they are required to file an updated copy of the program. No issues.

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- |           |   |   |   |
|-----------|---|---|---|
| <b>18</b> | Is state verifying operator's gas distribution integrity management Programs (DIMP)? This should include a review of DIMP plans, along with monitoring progress. In addition, the review should take in to account program review and updates of operators plan(s). 49 CFR 192 Subpart P<br>DIMP ? First round of program inspections should be complete by December 2014 | 2 | 2 |
|-----------|---|---|---|

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes. DIMP inspections have been completed for the private natural gas distribution in CY 2013 by NH PUC staff. No issues.

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- |           |  |   |   |
|-----------|--|---|---|
| <b>19</b> | Is state verifying operators Public Awareness programs are up to date and being followed. State should also verify operators have evaluated Public Awareness programs for effectiveness as described in RP1162. 49 CFR 192.616 (I13-16)<br>PAPEI Effectiveness Inspections should be complete by December 2013 | 2 | 2 |
|-----------|--|---|---|

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, PAPEI inspections were performed on the private natural gas distribution systems before December 31, 2013. A review of files confirms this work. No issues.

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- |           |   |   |   |
|-----------|---|---|---|
| <b>20</b> | 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). (G20-21)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|---|---|---|

Evaluator Notes:

Yes, they have participated in several One Call public awareness programs and provide additional information via NH PUC website.

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- |           |  |   |    |
|-----------|--|---|----|
| <b>21</b> | Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.3 (B6)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|-----------|--|---|----|

Evaluator Notes:

NA. No safety related condition reports occurred in CY2013.

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- |           |   |   |   |
|-----------|---|---|---|
| <b>22</b> | Did the State ask Operators to identify any plastic pipe and components that has shown a record of defects/leaks and what those operators are doing to mitigate the safety concerns? (G13)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|---|---|---|

Evaluator Notes:

Yes, the operators are required to identify any plastic pipe and components that show a record of defects and file the information with them. This is a requirement listed in NH PUC order 25370 which became effective May 30, 2012. No issues.

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- |           |   |   |   |
|-----------|---|---|---|
| <b>23</b> | Did the state participate in/respond to surveys or information requests from NAPS or PHMSA? (H4)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|---|---|---|

Evaluator Notes:

Yes, informal emails from other State Program Managers have been received and responded to along with NARUC surveys and request for information about the NH PUC program. No issues.

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- |           |  |           |           |
|-----------|--|-----------|-----------|
| <b>24</b> | 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.<br>Info Only = No Points | Info Only | Info Only |
|-----------|--|-----------|-----------|

Evaluator Notes:

No waivers or special permits have been issued in CY2013.

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- |           |  |           |           |
|-----------|--|-----------|-----------|
| <b>25</b> | General Comments:<br>Info Only = No Points | Info Only | Info Only |
|-----------|--|-----------|-----------|

Evaluator Notes:

No loss of points occurred in this section. NH PUC is generally complying with Section C.

Total points scored for this section: 45  
Total possible points for this section: 45

**PART D - Compliance Activities****Points(MAX) Score**

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- |          |   |   |   |
|----------|---|---|---|
| <b>1</b> | Does the state have written procedures to identify steps to be taken from the discovery to resolution of a probable violation? Chapter 5.1 (B12-14, B16, B1h)<br>Yes = 4 No = 0 Needs Improvement = 1-3 | 4   | 4                                       |
| a.       | Procedures to notify an operator (company officer) when a noncompliance is identified   | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b.       | Procedures to routinely review progress of compliance actions to prevent delays or breakdowns   | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |

**Evaluator Notes:**

- a. This item was corrected from last year's comments in the state program evaluation letter and added in NH PUC written procedures Section IX Enforcement Procedures. All notifications are now being sent to the company officer.
- b. Yes, this is addressed in NH PUC rule numbers 511.01-511.10 & listed in written procedures Section IX.
- 

- |          |  |   |   |
|----------|--|---|---|
| <b>2</b> | 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 (B11,B18,B19)<br>Yes = 4 No = 0 Needs Improvement = 1-3 | 4   | 4                                       |
| a.       | Were compliance actions sent to company officer or manager/board member if municipal/government system?  | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b.       | Were probable violations documented?   | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c.       | Were probable violations resolved?   | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d.       | Was the progress of probable violations routinely reviewed?  | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |

**Evaluator Notes:**

- A. Yes, a review of NH PUC compliance file found a letter was sent to Mr. Christopher Wagner, Director, AmeriGas Company on March 24, 2014.
- B. Yes, several probable violations were described in the letter.
- C. Yes, violations were resolved by consent agreement on April 15, 2014
- D. Yes progresses of violations are reviewed routinely by Program Manager.
- 

- |          |  |   |   |
|----------|--|---|---|
| <b>3</b> | Did the state issue compliance actions for all probable violations discovered? (B15)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

**Evaluator Notes:**

Yes, a review of 2013 NH PUC Progress Report Attachment 5 showed thirteen compliance actions were taken against the following operators: Osterman, Roy Brothers, Liberty, Unitil, Allen & Mathewson, Dover Housing and SDE. No issues of concern.

---

- |          |  |   |   |
|----------|--|---|---|
| <b>4</b> | Did compliance actions give reasonable due process to all parties? Including "show cause" hearing if necessary. (B17, B20)<br>Yes = 2 No = 0 | 2 | 2 |
|----------|--|---|---|

**Evaluator Notes:**

Yes, this is addressed in NH PUC Rule 511.09 and described in NH PUC written procedures manual section IX Enforcement Procedures page 12. No issues of concern.

---

- |          |   |   |   |
|----------|---|---|---|
| <b>5</b> | Is the program manager familiar with state process for imposing civil penalties? Were civil penalties considered for repeat violations (with severity consideration) or violations resulting in incidents/accidents? (describe any actions taken) (B27)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

**Evaluator Notes:**

Yes, Randy Knepper has imposed civil penalties in the amount of \$50,250 and collected an amount of \$3,750 in CY2013 several operators. He does understand the procedures in taking action against an operator for non-compliance with safety rules and regulations. No issues.

---

- 6 Can the State demonstrate it is using their enforcement fining authority for pipeline safety violations? 1 1  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes, in CY2013 NH PUC issued civil penalties in the amount of \$50,250 and collected \$3,750 against several operators.

---

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

Evaluator Notes:

No loss of points occurred in this section. NH PUC is generally complying with Section D.

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

## PART E - Incident Investigations

Points(MAX) Score

- |          |   |   |   |
|----------|---|---|---|
| <b>1</b> | Does state have adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports? And did state keep adequate records of Incident/Accident notifications received? Chapter 6 (A2,D1-3)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2   | 2                                       |
| a.       | Acknowledgement of MOU between NTSB and PHMSA (Appendix D)  | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b.       | Acknowledgement of Federal/State Cooperation in case of incident/accident (Appendix E)  | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |

**Evaluator Notes:**

Yes, NH PUC Guidelines for Pipeline Safety Inspections, Section V, Types of Inspection, "Failure Investigation Inspections", describes the receiving and responding to operator reports of accidents. This section reference the Appendices for the MOU and Federal/State Cooperation Agreements. No issues of concern.

- |          |   |   |    |
|----------|---|---|----|
| <b>2</b> | If onsite investigation was not made, did state obtain sufficient information from the operator and/or by other means to determine the facts to support the decision to not go on-site? Chapter 6 (D4)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

**Evaluator Notes:**

No incidents occurred in CY 2013. However, all incidents under NH PUC rules are reportable in accordance to Rule 504.5. Their reporting criterion is lower than the federal level of \$50,000. No issues

- |          |  |   |   |
|----------|--|---|---|
| <b>3</b> | Were all incidents investigated, thoroughly documented, and with conclusions and recommendations? (D5)<br>Yes = 3 No = 0 Needs Improvement = 1-2 | 3   | NA                                      |
| a.       | Observations and document review   | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b.       | Contributing Factors   | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c.       | Recommendations to prevent recurrences when appropriate  | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |

**Evaluator Notes:**

No incidents occurred in CY 2013. NA.

- |          |  |   |    |
|----------|--|---|----|
| <b>4</b> | Did the state initiate compliance action for violations found during any incident/accident investigation? (D6)<br>Yes = 1 No = 0 | 1 | NA |
|----------|--|---|----|

**Evaluator Notes:**

NA. No incidents occurred in CY2012.

- |          |  |   |    |
|----------|--|---|----|
| <b>5</b> | Did the state assist region office by taking appropriate follow-up actions related to the operator incident reports to ensure accuracy and final report has been received by PHMSA? (validate report data from operators concerning incidents/accidents and investigate discrepancies) Chapter 6 (D7)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

**Evaluator Notes:**

NA.

- |          |  |   |   |
|----------|--|---|---|
| <b>6</b> | Does state share lessons learned from incidents/accidents? (sharing information, such as: at NAPSR Region meetings, state seminars, etc) (G15)<br>Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

**Evaluator Notes:**

Yes, at the NAPSR Eastern Regional Meeting, Randy Knepper shared information on their reporting requirements, national incidents and other data on damage prevention and pipeline safety. No issues.

- |          |                   |           |           |
|----------|-------------------|-----------|-----------|
| <b>7</b> | General Comments: | Info Only | Info Only |
|----------|-------------------|-----------|-----------|

Info Only = No Points

Evaluator Notes:

No loss of points occurred in this section of the review. NH PUC is generally complying with Section E.

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Total points scored for this section: 3

Total possible points for this section: 3

## PART F - Damage Prevention

Points(MAX) Score

- |   |   |   |   |
|---|---|---|---|
| 1 | Has the state reviewed 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? NTSB (E1)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|---|---|---|

Evaluator Notes:

Yes, NH PUC has reviewed directional drilling in each of the local distribution companies Operation & Maintenance Manuals. For example, Northern Utilities Procedures Section 4.3; Liberty Utilities Procedure Damage Prevention Section 11. C were reviewed. Additionally, NH PUC Rule 805.02(e) covers this item under the reasonable care requirements.

- |   |  |   |   |
|---|--|---|---|
| 2 | Did the state inspector check to assure the pipeline operator is following its written procedures pertaining to notification of excavation, marking, positive response and the availability and use of the one call system? (E2)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Yes, NH PUC requires operators to report marking of underground facilities and any mismatch or failed to mark. They use the federal inspection form when reviewing this item. Additionally, data on the reporting requirement is reviewed by their Damage Prevention Staff member, Bill Ruoff, routinely. No issues.

- |   |   |   |   |
|---|---|---|---|
| 3 | Did the state encourage and promote practices for reducing damages to all underground facilities to its regulated companies? (i.e. such as promoting/adopting the CGA Best Practices encouraging adoption of the 9 Elements, etc.) (E3)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|---|---|---|

Evaluator Notes:

Yes, this is accomplished by the local distribution companies being a member of the New Hampshire Management Underground Safety Training (MUST) organization. NH PUC has several best practices in locating underground facilities pertaining to using only company personnel in locating their gas lines. This best practice was implemented thru individual NH PUC Order to each company operator. Additionally, training of operators on underground facility damage was conducted on February 6, March 5, April 2, July 26, August 9, October 9 and December 6, 2013.

- |   |  |   |   |
|---|--|---|---|
| 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? (This can include DIRT and other data shared and reviewed by the pipeline safety program) (E4,G5)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Yes, NH PUC collects data on pipeline damages per 1,000 locate request. Operators and excavators are required to submit monthly causes of excavation damage and final determinations are made after due process in accordance with NH PUC Rule 804.01 (a-e) (E-26). Trends are plotted and reviewed by staff. No issues of concern.

- |   |  |           |           |
|---|--|-----------|-----------|
| 5 | General Comments:<br>Info Only = No Points | Info Only | Info Only |
|---|--|-----------|-----------|

Evaluator Notes:

No issues or loss of points occurred in this section. NH PUC is generally complying with Section F.

Total points scored for this section: 8  
Total possible points for this section: 8



## PART G - Field Inspections

Points(MAX) Score

- 1 Operator, Inspector, Location, Date and PHMSA Representative Info Only Info Only  
Info Only = No Points

Name of Operator Inspected:

Unitil Northern Utilities

Name of State Inspector(s) Observed:

David Burnell, Safety Specialist

Location of Inspection:

Portsmouth, New Hampshire

Date of Inspection:

June 25, 2014

Name of PHMSA Representative:

Glynn Blanton, PHMSA State Program Evaluator

Evaluator Notes:

This was a pressure regulation and relief module inspection performed on the Borthwick Avenue Gate Station and Barberry Lane district regulator station that provides service to the City of Portsmouth.

- 2 Was the operator or operator's representative notified and/or given the opportunity to be present during inspection? (F2) 1 1  
Yes = 1 No = 0

Evaluator Notes:

Yes, Mr. Rick Ahlin, Supervisor Gas System Operators with Unitil Northern Utilities was notified by telephone and email message dated June 18, 2014 by Mr. David Burnell, NH PUC.

- 3 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) (F3) 2 2  
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, Mr. David Burnell used New Hampshire PUC Form #5, Pressure Regulator & Relief Module, to conduct the inspection. He was observed completing each item on the form as the inspection was being performed.

- 4 Did the inspector thoroughly document results of the inspection? (F4) 2 2  
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, a review of inspection form found information was entered correctly with comments provided by each question asked.

- 5 Did the inspector check to see if the operator had necessary equipment during inspection to conduct tasks viewed? (Maps, pyrometer, soap spray, CGI, etc.) (F5) 1 1  
Yes = 1 No = 0

Evaluator Notes:

Yes, prior to and during the regulator station reviews all equipment was checked by Mr. Burnell and discussed with the operator representatives.

- 6 Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list) (F7) 2 2  
Yes = 2 No = 0 Needs Improvement = 1

a. Procedures ☒

b. Records ☒

c. Field Activities ☒

d. Other (please comment) ☐

Evaluator Notes:

A records and procedures review was conducted with Mr. Rick Ahlin, Supervisor with Unitil Northern, prior to observing the testing of the two regulator station monitors in Portsmouth, NH.

7	Did the inspector have adequate knowledge of the pipeline safety program and regulations? (Evaluator will document reasons if unacceptable) (F8) Yes = 2 No = 0 Needs Improvement = 1	2	2
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Evaluator Notes:

Yes, Mr. Burnell has over ten years of experience in pipeline safety with the New Hampshire Public Utilities Commission.

8	Did the inspector conduct an exit interview? (If inspection is not totally complete the interview should be based on areas covered during time of field evaluation) (F9) Yes = 1 No = 0	1	1
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Evaluator Notes:

Yes, Mr. Burnell had a limited exit interview with the Unitil Northern personnel due to the potential probable violation that may be issued against the operator.

9	During the exit interview, did the inspector identify probable violations found during the inspections? (if applicable) (F10) Yes = 1 No = 0	1	1
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Evaluator Notes:

Yes, Mr. Burnell noted a probable violation to the operator representatives.

10	General Comments: What did the inspector observe in the field? (Narrative description of field observations and how inspector performed) Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices) Other. Info Only = No Points	Info Only	Info Only
----	--	-----------	-----------

- |    |                                   |                                     |  |
|----|-----------------------------------|-------------------------------------|--|
| a. | Abandonment                       | <input type="checkbox"/>            |  |
| b. | Abnormal Operations               | <input type="checkbox"/>            |  |
| c. | Break-Out Tanks                   | <input type="checkbox"/>            |  |
| d. | Compressor or Pump Stations       | <input type="checkbox"/>            |  |
| e. | Change in Class Location          | <input type="checkbox"/>            |  |
| f. | Casings                           | <input type="checkbox"/>            |  |
| g. | Cathodic Protection               | <input type="checkbox"/>            |  |
| h. | Cast-iron Replacement             | <input type="checkbox"/>            |  |
| i. | Damage Prevention                 | <input type="checkbox"/>            |  |
| j. | Deactivation                      | <input type="checkbox"/>            |  |
| k. | Emergency Procedures              | <input type="checkbox"/>            |  |
| l. | Inspection of Right-of-Way        | <input type="checkbox"/>            |  |
| m. | Line Markers                      | <input type="checkbox"/>            |  |
| n. | Liaison with Public Officials     | <input type="checkbox"/>            |  |
| o. | Leak Surveys                      | <input type="checkbox"/>            |  |
| p. | MOP                               | <input type="checkbox"/>            |  |
| q. | MAOP                              | <input type="checkbox"/>            |  |
| r. | Moving Pipe                       | <input type="checkbox"/>            |  |
| s. | New Construction                  | <input type="checkbox"/>            |  |
| t. | Navigable Waterway Crossings      | <input type="checkbox"/>            |  |
| u. | Odorization                       | <input type="checkbox"/>            |  |
| v. | Overpressure Safety Devices       | <input checked="" type="checkbox"/> |  |
| w. | Plastic Pipe Installation         | <input type="checkbox"/>            |  |
| x. | Public Education                  | <input type="checkbox"/>            |  |
| y. | Purging                           | <input type="checkbox"/>            |  |
| z. | Prevention of Accidental Ignition | <input type="checkbox"/>            |  |
| A. | Repairs                           | <input type="checkbox"/>            |  |
| B. | Signs                             | <input type="checkbox"/>            |  |
| C. | Tapping                           | <input type="checkbox"/>            |  |

- |    |                             |                                     |
|----|-----------------------------|-------------------------------------|
| D. | Valve Maintenance           | <input type="checkbox"/>            |
| E. | Vault Maintenance           | <input type="checkbox"/>            |
| F. | Welding                     | <input type="checkbox"/>            |
| G. | OQ - Operator Qualification | <input checked="" type="checkbox"/> |
| H. | Compliance Follow-up        | <input type="checkbox"/>            |
| I. | Atmospheric Corrosion       | <input type="checkbox"/>            |
| J. | Other                       | <input type="checkbox"/>            |

Evaluator Notes:

I observed Unitil maintenance crew testing two regulator stations with monitors and worker regulators in the Portsmouth area. Probable violation(s) may have occurred due over pressure protection and operation of worker and monitor regulators failure to close at the correct set pressure.

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Total points scored for this section: 12  
Total possible points for this section: 12

**PART H - Interstate Agent State (If Applicable)****Points(MAX)    Score**

- |          |   |   |    |
|----------|---|---|----|
| <b>1</b> | Did the state use the current federal inspection form(s)? (C1)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

N/A

- |          |  |   |    |
|----------|--|---|----|
| <b>2</b> | Are results documented demonstrating inspection units were reviewed in accordance with "PHMSA directed inspection plan"? (C2)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

N/A

- |          |   |   |    |
|----------|---|---|----|
| <b>3</b> | Did the state submit documentation of the inspections within 60 days as stated in its latest Interstate Agent Agreement form? (C3)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

N/A

- |          |  |   |    |
|----------|--|---|----|
| <b>4</b> | Were probable violations identified by state referred to PHMSA for compliance? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.) (C4)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

N/A

- |          |  |   |    |
|----------|--|---|----|
| <b>5</b> | Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? (C5)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

N/A

- |          |   |   |    |
|----------|---|---|----|
| <b>6</b> | Did the state give written notice to PHMSA within 60 days of all probable violations found? (C6)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

N/A

- |          |  |   |    |
|----------|--|---|----|
| <b>7</b> | Did the state initially submit documentation to support compliance action by PHMSA on probable violations? (C7)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

N/A

- |          |  |           |           |
|----------|--|-----------|-----------|
| <b>8</b> | General Comments:<br>Info Only = No Points | Info Only | Info Only |
|----------|--|-----------|-----------|

Evaluator Notes:

N/A

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

**PART I - 60106 Agreement State (If Applicable)****Points(MAX)    Score**

- |          |  |   |    |
|----------|--|---|----|
| <b>1</b> | Did the state use the current federal inspection form(s)? (B21)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

N/A

- |          |  |   |    |
|----------|--|---|----|
| <b>2</b> | Are results documented demonstrating inspection units were reviewed in accordance with state inspection plan? (B22)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

N/A

- |          |   |   |    |
|----------|---|---|----|
| <b>3</b> | Were any probable violations identified by state referred to PHMSA for compliance? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.) (B23)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

N/A

- |          |   |   |    |
|----------|---|---|----|
| <b>4</b> | Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? (B24)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

N/A

- |          |  |   |    |
|----------|--|---|----|
| <b>5</b> | Did the state give written notice to PHMSA within 60 days of all probable violations found? (B25)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

N/A

- |          |  |   |    |
|----------|--|---|----|
| <b>6</b> | Did the state initially submit adequate documentation to support compliance action by PHMSA on probable violations? (B26)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

N/A

- |          |  |           |           |
|----------|--|-----------|-----------|
| <b>7</b> | General Comments:<br>Info Only = No Points | Info Only | Info Only |
|----------|--|-----------|-----------|

Evaluator Notes:

N/A

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