



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

1200 New Jersey Avenue SE  
Washington DC 20590

# 2011 Natural Gas State Program Evaluation

for

NM PIPELINE SAFETY BUREAU

## 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)



2011 Natural Gas State Program Evaluation -- CY 2011  
Natural Gas

**State Agency:** New Mexico

**Agency Status:**

**Date of Visit:** 04/09/2012 - 10/19/2012

**Agency Representative:** Jason N. Montoya, PE, Bureau Chief

**PHMSA Representative:** Patrick Gaume, State liaison

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

**Name/Title:** Mr. Ben L. Hall, Chairman

**Agency:** New Mexico Public Regulation Commission

**Address:** 1120 Paseo de Peralta, 4th floor, P.O. Box 1269

**City/State/Zip:** Santa Fe, New Mexico 87504-1269

**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 2011 (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.

**Scoring Summary**

**PARTS**

**Possible Points    Points Scored**

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)

10                      9  
15                      15  
42                      42  
14                      14  
8                        8  
8                        8  
12                      12  
0                        0  
0                        0

**TOTALS**

**109                      108**

**State Rating .....**

**99.1**

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## PART A - Progress Report and Program Documentation Review

Points(MAX) Score

- |          |   |   |   |
|----------|---|---|---|
| <b>1</b> | 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:

A1. Yes. Attachment 1 is in agreement with PRC records, Attachment 3 & Attachment 8. I encouraged NM PRC to establish jurisdiction for LNG.

- |          |  |   |     |
|----------|--|---|-----|
| <b>2</b> | Review of Inspection Days for accuracy - Progress Report Attachment 2 (A1b)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 0.5 |
|----------|--|---|-----|

Evaluator Notes:

A2. NI 0.5 pt. A detailed review of Attachment 2 revealed some calculation errors for the Natural Gas program. A revised Attachment 2 has been submitted to FedStar.

- |          |  |   |   |
|----------|--|---|---|
| <b>3</b> | 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:

A3. Yes. Attachment 3 is in agreement with PRC records and Attachment 1.

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

Evaluator Notes:

A4. Yes. NM records show two significant gas incidents but ODES & PDM show zero significant gas incidents. NM has directed the operators to submit the incident reports into the Federal database.

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

Evaluator Notes:

A5. Yes, Attachment 5 is in agreement with PRC records & the math is right

- |          |   |   |   |
|----------|---|---|---|
| <b>6</b> | 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:

A6. Yes, the official files are now electronic

- |          |  |   |     |
|----------|--|---|-----|
| <b>7</b> | Was employee listing and completed training accurate and complete? - Progress Report Attachment 7 (A1g)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 0.5 |
|----------|--|---|-----|

Evaluator Notes:

A7. NI 0.5 pt. A detailed review of Attachment 7 revealed some calculation errors for the Natural Gas program. A revised Attachment 7 has been submitted to FedStar.

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

Evaluator Notes:

A8. Yes, The information appears correct. NM PRC was encouraged to extend jurisdiction over LNG even though there is no LNG in NM at this time

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

Evaluator Notes:

A9. Yes, The NM PRC assesses civil penalties for 3rd party damages. Typical fines range from \$811-5000 for repeat violators. The NM PRC, Pipeline Industry, and other stakeholders have established a much stronger partnership for pipeline safety developed through public outreach and education conducted by NM PRC staff. The NM PRC has converted to an electronic database for all correspondence, inspections, documents, etc. The NM PRC has improved its Operator docket which is the instrument used to track inspections, violations, and progress toward compliance. The NM PRC has implemented a web-based 3rd party damage reporting tool, DRETS, which will allow a more effective and efficient damage prevention program. NM PRC personnel continue to participate on the NAPSIR DIMP and GAP committees. The NM PRC participated in the Regional and National NAPSIR Meetings, and Mr. Montoya participated on Liaison Committee. The program for issuing tickets for excavation violations is proving successful. It is expected that additional personnel will become necessary when the immediate mandatory reporting of line hits becomes effective. All gas units are being inspected within the 3 year inspection cycle and high-risk units are being inspected more often. NM PRC plans on conducting 25% of all DIMP inspections in 2012. Restrictions on out of state inspections have been lifted which enabled increased compliance inspections related to Drug and Alcohol, Operator Qualification, Operation and Maintenance Procedure, compliance. In 2011 the Master Meter Outreach Program was re-presented at four locations around the State, and feedback indicates that it was needful and very successful. Two vacancies existed at the end of 2011 but will be filled during 2012. Efforts to find additional regulated gathering lines continued throughout 2011.

Additional NM PRC personnel have been developed and qualified such that ON-Call Duty has been expanded from two personnel to four personnel.

HB 500 to mandate immediate notification of excavation damage by excavators, has been passed by the Legislature and was signed by the Governor in 2011. The NM PRC adopted more stringent rules during the notice of proposed rulemaking in 2011.

Continuing a program (docket 03-00144-PL, & 03-00073PL) that was started in 2003 to replace bare main, PVC, and ABS pipelines. NM PRC continues to encourage operators to replace inferior pipe and will enforce such recommendations through quality integrity management inspections.

10 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

A10. NM PRC was aggressively trying to fill personnel vacancies in 2011, there were three hires and one resignation during the year. 2011 ended with one position still being advertised

Total points scored for this section: 9  
Total possible points for this section: 10

## PART B - Program Inspection Procedures

Points(MAX)    Score

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

Evaluator Notes:

B1. Yes, SOP Section 1 VI & Section 3

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

Evaluator Notes:

B2. Yes, SOP Section 1 V & Section 3

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

Evaluator Notes:

B3. Yes, SOP Section 1 V & Section 3

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

Evaluator Notes:

B4. Yes, Damage Prevention Inspections are not stand alone inspections; Damage Prevention is addressed during Standard Inspections, IMP Inspections, and PAPE inspections

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

Evaluator Notes:

B5. Yes, SOP Section 3 IV

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

Evaluator Notes:

B6. Yes, SOP Section 1 V & Section 3

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

Evaluator Notes:

B7. Yes, SOP Section 2

<b>8</b>	<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)</b>	<b>6</b>	<b>6</b>
Yes = 6 No = 0 Needs Improvement = 1-5			

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 <input checked="" type="radio"/>	No <input type="radio"/>	Needs Improvement <input type="radio"/>
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 <input checked="" type="radio"/>	No <input type="radio"/>	Needs Improvement <input type="radio"/>

f. Are inspection units broken down appropriately?

Yes ☒ No ☐ Needs Improvement ☐

Evaluator Notes:

B8. Yes, SOP Section 1, specifically Section 1 VI. In addition, NM PRC has created a formal evaluation process for risk factors and fully used the risk based process in 2011. Units are created per The State Guidelines.

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9 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

B9. New Mexico has been recognized as being only one of 16 states where Damage Prevention is a joint effort with State Agencies, Utility owners, Federal DOT, and the Governor's Office.

The NM PRC is discovering that the best way to find jurisdictional lines is establishing working relationships with all stakeholders. The NM PRC is using various means to identify additional newly jurisdictional gathering lines including items observed during Field Inspections, local knowledge, contractor info and Operator knowledge. Particular focus is Class 3 areas and growing class 2 areas that are outside of city limits.

We appreciate the decision to maintain the NM PRC in a robust state. Authorized staff is being maintained at 11 people. It is noted that there was mostly 10 staff during 2011.

The NM PRC has implemented a plan to conduct initial DIMP inspections over the next 3 years.

The NM PRC has an on-going effort to gather plastic pipe information from Operators. The Operators have been reluctant to do so. The intent is to identify inferior pipe within the State and develop a plan to remove/replace and educate the Plastic Pipe community on developing issues.

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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):  
436.00

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):  
 $220 \times 4.47 = 984.23$

Ratio: A / B  
 $436.00 / 984.23 = 0.44$

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

### Evaluator Notes:

C1. Yes, 436 inspection days, 4.43 Inspector years, Ratio=.447, okay. These are corrected numbers. Revised Attachments 2 & 7 have been submitted to FedStar.

- 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:

C2. Yes, All inspectors with 3 years of service are certified, 4 inspectors are certified to lead GIMP, LIMP, & OQ. The Program Manager is still within his 5 year training window.

- 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:

C3. Yes. Jason is fully engaged in his role as Pipeline Safety Manager and his staff is supportive.

- 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:

C4. Yes, Response was in about 50 days (dated February 16, 2012) & addressed all 4 items that were requested

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

### Evaluator Notes:

C5. Yes, past TQ Seminars were held June 13-15, 2005, Sept 24-26, 2008, Oct 19-21, 2009, June 15-17, 2010, and September 13-15, 2011. The next seminar is targeted for May 21-23, 2013

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

### Evaluator Notes:

C6. Yes, all types of inspections are within their time intervals

7	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) Yes = 2 No = 0 Needs Improvement = 1	2	2
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Evaluator Notes:

C7. Yes, NM PRC uses the Federal Forms, current version, and spot checks of inspections and related NOPV shows complete inspections that are consistent with the NOPVs. Reviewed GIMP-City of Las Vegas 2011, LIMP-DCP Midstream 2011, HL Standard11-041411-24-P/HL, NG Standard11-021411-15-T, OQ 11-041811-22-PD, D&A11-012411-05, Accident 12-120812-41-HL, & Incident 11-020911-03. No DIMP or Construction were conducted in 2011.

8	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) Yes = 1 No = 0	1	NA
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Evaluator Notes:

C8. NA, there is no remaining cast iron in service in NM

9	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) Yes = 1 No = 0	1	NA
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Evaluator Notes:

C9. NA, there is no remaining cast iron in service in NM

10	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) Yes = 1 No = 0	1	1
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Evaluator Notes:

C10. Yes. These questions are part of an addendum sheet and have been attached to standard Inspections. It is also on the current Fed dist Insp Form (Form 2), .615(a)(7) on pg 5

11	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) Yes = 1 No = 0	1	1
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Evaluator Notes:

C11. Yes, It is on the current gas distribution standard inspection form, and it has been added to an addendum sheet and is part of every standard inspection

12	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) Yes = 2 No = 0 Needs Improvement = 1	2	2
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Evaluator Notes:

C12. Yes. Fee and Grant monies are dependent on Annual reports, and they are therefore reviewed closely for completeness, miles of pipe, and leak history. The reports are compared with prior year reports.

Yes, the incident and accident files are well documented and complete.

Yes, Data Analysis is now well developed. NM PRC is gathering DIRT, annual reports, inspection results, and other One-Call data. The disaggregating and trending of the data was fully implemented in 2011 and is impacting the risk ranking of Units and Operators for inspections starting in 2012.



- 13 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) 2 2  
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

C13. Yes, 31 OQ inspection were performed and uploaded in 2011, also 19 Gimp & 5 LIMP inspections were performed and uploaded ? they were exclusively Protocols As or Is.

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

Evaluator Notes:

C14. Yes, this question has been added to the addendum sheet for standard inspections. The inspectors are actually checking NPMS during Unit Standard Inspections.

- 15 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) 2 2  
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

C15. Yes, the Federal Long form is used for HQ D&A inspections at least every 4 years and this question is asked

- 16 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) 2 2  
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

C16. Yes, the NM PRC SOP requires that full OQ inspections of each operator are required every 6 years. Protocol 9 inspections are required of each Unit every 3 years and are usually done as part of a standard inspection

- 17 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) 2 2  
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

C17. Yes, all types of inspections are within their time intervals

- 18 Is state verifying operator's gas distribution integrity management Programs (DIMP)? Info Only Info Only  
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  
Info Only = No Points

Evaluator Notes:

C18. Yes, This is a work in progress. All current PL inspectors with 3 yr experience have taken the DIMP class and DIMP inspections started in 2012. Target is to conduct the first round of DIMP inspections by the end of 2014.

- 19 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) 2 2  
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

C19. Yes, all PL safety inspectors have completed the PAPEE class, and are in process to complete the first round of PAPE Inspections by the end of 2012.

- 20** 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) 1 1  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

C20. Yes, through the NM Regional Common Ground Alliance, also by conducting seminars, making presentations at Trade Meetings, at Construction Industry Board Meetings, & at special meetings for Construction Industry Boards & their staffs. Also Master Meter Outreach presentations and Security & Integrity Foundation (SIF) training sessions. In early 2011 the NM PRC made a presentation at the National CGA. The NM PRC also attends and supports NUCA meetings and programs, NMRCGA Meetings and programs, and NMGA programs. Also, the Program Manager sits on the NM811 Board as an advisor.

Yes, the public has access to NM PRC records of inspections, violations, and etc. The NM PRC recently established a website (DRETS) to facilitate the posting of 3rd party damage reports that may be accessed by all stakeholders.

- 21** Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.3 (B6) 1 1  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

C21. Yes. there was 2 SRCR in 2011, as an FYI there was one in 2010, and 2 so far in 2012

- 22** 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) 1 1  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

C22. Yes. NM asked operators and they chose not to respond. They stated they will do it when it is required. This question is on the addendum sheet for Standard inspections. Also the Drisco pipe Advisory Notice was emailed to all NM operators.

- 23** Did the state participate in/respond to surveys or information requests from NAPSIR or PHMSA? (H4) 1 1  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

C23. Yes. All e-mails and surveys are responded to. Also NM PRC personnel are actively participating on three NAPSIR Committees. (Liaison, Distribution Form revision, PAPEE).

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

Evaluator Notes:

C24. Damage Prevention continues to be robust. NM Virtual DIRT is in it's 3rd year. The program for issuing tickets for excavation violations is in it's 2nd year and all shareholders agree it is an effective tool for pipeline safety. Effective 1st Qtr, 2010 the one-call center went 24-7-365 to address emergency tickets and the NM PRC is copied by email in real time whenever emergency, damage, warning, design, and wide area conference tickets are requested.

NM PRC's efforts to establish PAPEE is noted, particularly NM PRC staff's participation on the PAP Committee, and the use of New Mexico's Public Awareness Form as the prototype for the Federal Form. The NM PRC's continuing partnership with Operators concerning Public Awareness through participation in CGA, NUCA, NM811, and NMGA is noted.

Total points scored for this section: 42  
Total possible points for this section: 42

## PART D - Compliance Activities

Points(MAX) Score

- |          |   |   |   |
|----------|---|---|---|
| <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:

D1. Yes, in the SOP, Section 1. Also, per NM PRC rule 18.60.4.12 the Pipeline Safety Bureau (PSB) is authorized to directly assess civil penalties. The NM PRC PSB follows its own procedures.

- |          |  |   |   |
|----------|--|---|---|
| <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"/> |

Evaluator Notes:

D2. Yes; All inspection reports and supporting documentation are saved electronically on the NM PRC server and backed up with a PDF copy that is also mailed to the operator. The operator is required to formally respond acknowledging probable violations individually and take corrective action, request a settlement conference, or hearing with the NM PRC. All responses, follow-up work and documents are saved electronically specific to each inspection. These electronic files are the official files. Additionally, NM PRC is in the process of converting to a web based inspection program that will allow a more efficient and effective process. The Bureau Chief sends a final letter when a case has been resolved. See SOP, section 1, VIII, B.

- |          |  |   |   |
|----------|--|---|---|
| <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:

D3. Yes, 59 in 2011, 84 in 2010, 108 in 2009, 105 in 2008, 109 in 2007, and 129 in 2006

- |          |  |   |   |
|----------|--|---|---|
| <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:

D4. Yes, it is in the SOP, section 1.VIII.c.1.b.3 & 4, and due process is afforded all per the SOP & State Regulations.

- |          |   |   |   |
|----------|---|---|---|
| <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:

D5. Yes, the Program Manager assesses civil penalties for all 3rd party damages. The Program Manager recommends civil penalties as appropriate for violations of pipeline safety regulations.

- |          |  |           |           |
|----------|--|-----------|-----------|
| <b>6</b> | Can the State demonstrate it is using their enforcement fining authority for pipeline safety violations? (new question)<br>Info Only = No Points | Info Only | Info Only |
|----------|--|-----------|-----------|

Evaluator Notes:

D6. Yes, The NM PRC has an established process in place for assessing civil penalties for pipeline safety probable violations which are considered on a case by case basis depending on the circumstances (i.e., loss of life, property damaged, service interruptions, location, etc.) supported by a \$317,000 fine in 2010. The NM PRC also has an established procedure in place for assessing civil penalties upon excavation alleged violators for non-compliance of NM Excavation Law policies and procedures.

---

7 General Comments:  
Info Only = No Points

Info OnlyInfo Only

Evaluator Notes:

D7. NM PRC is committed to Pipeline Safety and uses all available regulatory tools to enforce the regulations including the judicious assessing of civil penalties when the violation endangers the public or is a repeated violation.

---

Total points scored for this section: 14  
Total possible points for this section: 14



## PART E - Incident Investigations

Points(MAX) Score

- 1 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) 2 2

Yes = 2 No = 0 Needs Improvement = 1

- a. Acknowledgement of MOU between NTSB and PHMSA (Appendix D) Yes ☒ No ☐ Needs Improvement ☐
- b. Acknowledgement of Federal/State Cooperation in case of incident/accident (Appendix E) Yes ☒ No ☐ Needs Improvement ☐

### Evaluator Notes:

E1. Yes, is in the SOP sec 2; 1. Determine if safety violations occurred. 2. Determine root causes of the accident if asked by NTSB. 3. Cooperate with NTSB. Also, the MOU between NTSB and OPS is understood, and NM PRC fully cooperates with NTSB. There are 3 records out of 3 Federally reportable incidents.

- 2 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) 1 1

Yes = 1 No = 0 Needs Improvement = .5

### Evaluator Notes:

E2. Yes. In 2011, all 3 federally reportable incidents were discussed with the Operator and had on-site visits. Two of the incident investigations resulted in NOPV. The SOP directs that Pipeline Safety personnel review all notifications and obtain sufficient information to decide whether an on-site investigation is needed.

- 3 Were all incidents investigated, thoroughly documented, and with conclusions and recommendations? (D5) 3 3

Yes = 3 No = 0 Needs Improvement = 1-2

- a. Observations and document review Yes ☒ No ☐ Needs Improvement ☐
- b. Contributing Factors Yes ☒ No ☐ Needs Improvement ☐
- c. Recommendations to prevent recurrences when appropriate Yes ☒ No ☐ Needs Improvement ☐

### Evaluator Notes:

E3. Yes, yes, yes. The incident files were detailed and complete. The fed form is followed; Observations, documentation, identifying contributing factors, and prevention recommendations are all included.

- 4 Did the state initiate compliance action for violations found during any incident/accident investigation? (D6) 1 1

Yes = 1 No = 0

### Evaluator Notes:

E4. Yes. Two of the incident investigations resulted in NOPV.

- 5 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) 1 NA

Yes = 1 No = 0 Needs Improvement = .5

### Evaluator Notes:

E5. NA, the Federal region office made no requests in 2011. NM PRC is a partner with PHMSA to ensure that incident reports are accurate & updated,

- 6 Does state share lessons learned from incidents/accidents? (sharing information, such as: at NAPS Region meetings, state seminars, etc) (G15) 1 1

Yes = 1 No = 0

### Evaluator Notes:

E6. Yes, NM PRC makes a report during the SW Region NAPS Region Meeting, and responds as appropriate to email correspondence. All three of the 2011 year incidents were discussed at SW Region NAPS Region Meeting for things discovered and lessons learned. Lessons learned and audit findings are constantly being shared with NM operators.

---

7 General Comments:  
Info Only = No Points

Info OnlyInfo Only

Evaluator Notes:

E7. The NM PRC SOP and actual practices are in compliance for incident investigations. All findings and reports are available to NAPSAR and PHMSA.

---

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



## 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:

F1. Yes. This has been added to an addendum sheet and is part of every standard inspection

- |   |  |   |   |
|---|--|---|---|
| 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:

F2. Yes, It is addressed under 192.614c and is on the Standard inspection form. NM PRC requires Pipeline Operators to report ALL 3rd party damages within 30 days to the PSB through the NM PRC website (DRETS).

- |   |   |   |   |
|---|---|---|---|
| 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:

F3. Yes, this is an ongoing priority effort. The NM PRC PSB is on the NM811 Board and co-sponsors the Regional CGA meetings. The NM PRC PSB meets with damage prevention stakeholders during the monthly NMRCGA meetings to discuss best practices. The NM PRC PSB holds a monthly NM Excavation Law and Procedures class for alleged violators to attend. This class is mandatory for repeat violators. Three master meter outreach programs were conducted in 2011, 97 additional excavation law and procedures classes were conducted for 2337 individuals, and a two day seminar was conducted in September 2011 where 811 was advertised. It was sponsored by NMPRC, NM811, NUCA, & NM Gas Assoc. These organizations are the original members and trainers promoting damage prevention.

- |   |  |   |   |
|---|--|---|---|
| 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:

F4. Yes. NM PRC PSB has access to all locate requests and all damage reports. Evaluations concerning type of damage, hits per alleged violator, cost to repair, injuries, by date, & hit frequency have been done. PSB applied for permission to enter into an information sharing contract with NM One-Call to further enhance data analysis and data collection, and to get the information entered into DIRT (Damage Information Reporting Tool). The contract with NM One-Call was signed in December, 2009 and data is being entered into DIRT. HB 500 (recently passed 3/2011) will allow One-Call & PSB to create the New Mexico virtual DIRT Program. Disaggregation of data will be much easier.

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

Evaluator Notes:

F5. During the last six years PSB has worked to implement the improvement of Public Awareness, the launching of 811, the creation of the NM Regional Common Ground Alliance, the improvement of NM811, exercising authority over excavators, enforcing and issuing fines upon underground facility owners and excavators that have routinely violated the NM Excavation Law, and participated in nationwide data gathering efforts like DIRT. Effective in the 2nd half of 2009 the PSB personnel were provided the authority to issue written tickets for excavation law violations. Fines are typically \$811 with authority up to \$5000 for first offense & \$25,000 for subsequent offense. An appeal of the fine could be handled by the PSB or through a NM PRC hearing. The NM PRC damage prevention program's efforts have recently received national recognition and is considered a leader in protecting underground facilities. The PSB Chief was recently nominated to serve on the national Common Ground Alliance Board which serves 1,400 individual members, 180 organization members and 44 sponsors.

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:

Southern Union Gas Service opid 18526

Name of State Inspector(s) Observed:

Dennis M Segura, Inspector NMPRC & Joe Johnson, Supervisor, NMPRC

Location of Inspection:

610 S Commerce St, PO Box 1226, Jal, NM 88252

Date of Inspection:

April 11-12, 2012

Name of PHMSA Representative:

Patrick Gaume

Evaluator Notes:

G1. Standard Inspection - Form 1 rev 08/04/11, Southern Union Gas Service opid 18526; Dennis M Segura, Inspector NMPRC & Joe Johnson, Supervisor, NMPRC; 610 S Commerce St, PO Box 1226, Jal, NM 88252; April 11-12, 2012; Patrick Gaume

- 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:

G2. Yes, The Operator was notified and the inspection was in SUG's office with 4 SUG personnel present.

- 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:

G3. Yes. Standard Inspection ? Form 1, Rev 08/04/2011

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

Evaluator Notes:

G4. Yes. All questions had written answers or documentation; including those with satisfactory findings.

- 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:

G5. Yes, half-cell, multi meter, keys, hand tools.

- 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             | <input checked="" type="checkbox"/> |
| b. Records                | <input checked="" type="checkbox"/> |
| c. Field Activities       | <input checked="" type="checkbox"/> |
| d. Other (please comment) | <input type="checkbox"/>            |

Evaluator Notes:

G6. Yes, He performed a full Standard Inspection including Procedures, Records, and Field.



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

Evaluator Notes:

G7. Yes. Dennis demonstrated professional knowledge and skills of the Standard inspection process.

- |   |  |   |   |
|---|--|---|---|
| 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)<br>Yes = 1 No = 0 | 1 | 1 |
|---|--|---|---|

Evaluator Notes:

G8. Yes. Procedures ? made some modifications to the Procedures during the inspection.

- |   |   |   |   |
|---|---|---|---|
| 9 | During the exit interview, did the inspector identify probable violations found during the inspections? (if applicable) (F10)<br>Yes = 1 No = 0 | 1 | 1 |
|---|---|---|---|

Evaluator Notes:

G9. Yes. Procedures ? made some modifications to the Procedures during the inspection. No violations found. Consider a process to inspect and access soil water interfaces that are rock shielded. Field ? no violations found. Records ? one records issue: the 2010 procedures review exceeded 15 months.

- |    |  |           |           |
|----|--|-----------|-----------|
| 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.<br>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 checked="" type="checkbox"/> |
| e. | Change in Class Location          | <input type="checkbox"/>            |
| f. | Casings                           | <input type="checkbox"/>            |
| g. | Cathodic Protection               | <input checked="" type="checkbox"/> |
| h. | Cast-iron Replacement             | <input type="checkbox"/>            |
| i. | Damage Prevention                 | <input checked="" type="checkbox"/> |
| j. | Deactivation                      | <input type="checkbox"/>            |
| k. | Emergency Procedures              | <input type="checkbox"/>            |
| l. | Inspection of Right-of-Way        | <input checked="" type="checkbox"/> |
| m. | Line Markers                      | <input checked="" type="checkbox"/> |
| n. | Liaison with Public Officials     | <input type="checkbox"/>            |
| o. | Leak Surveys                      | <input checked="" type="checkbox"/> |
| p. | MOP                               | <input type="checkbox"/>            |
| q. | MAOP                              | <input checked="" 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 checked="" 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 type="checkbox"/>            |
| H. | Compliance Follow-up        | <input type="checkbox"/>            |
| I. | Atmospheric Corrosion       | <input checked="" type="checkbox"/> |
| J. | Other                       | <input type="checkbox"/>            |

Evaluator Notes:

G10. Yes, locks, fence, signs, markers, valves, relief valves, actuators, MAOP, Operating pressure, CP, ROW, vehicle barriers, air-soil interface, old leak site, atmospheric corrosion.

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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:

H1-8. NA not an interstate Agent Program.

- |          |  |   |    |
|----------|--|---|----|
| <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:

H1-8. NA not an interstate Agent Program.

- |          |   |   |    |
|----------|---|---|----|
| <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:

H1-8. NA not an interstate Agent Program.

- |          |  |   |    |
|----------|--|---|----|
| <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:

H1-8. NA not an interstate Agent Program.

- |          |  |   |    |
|----------|--|---|----|
| <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:

H1-8. NA not an interstate Agent Program.

- |          |   |   |    |
|----------|---|---|----|
| <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:

H1-8. NA not an interstate Agent Program.

- |          |  |   |    |
|----------|--|---|----|
| <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:

H1-8. NA not an interstate Agent Program.

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

Evaluator Notes:

H1-8. NA not an interstate Agent Program.

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:

I.1-7. NA not a 60106 Agreement Program.

- |          |  |   |    |
|----------|--|---|----|
| <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:

I.1-7. NA not a 60106 Agreement Program.

- |          |   |   |    |
|----------|---|---|----|
| <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:

I.1-7. NA not a 60106 Agreement Program.

- |          |   |   |    |
|----------|---|---|----|
| <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:

I.1-7. NA not a 60106 Agreement Program.

- |          |  |   |    |
|----------|--|---|----|
| <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:

I.1-7. NA not a 60106 Agreement Program.

- |          |  |   |    |
|----------|--|---|----|
| <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:

I.1-7. NA not a 60106 Agreement Program.

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

Evaluator Notes:

I.1-7. NA not a 60106 Agreement Program.

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