



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

1200 New Jersey Avenue SE
Washington DC 20590

2011 Hazardous Liquid State Program Evaluation

for

RAILROAD COMMISSION OF TEXAS

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 -- Accident Investigations
- F -- Damage Prevention
- G -- Field Inspections
- H -- Interstate Agent State (if applicable)
- I -- 60106 Agreement State (if applicable)



2011 Hazardous Liquid State Program Evaluation -- CY 2011
Hazardous Liquid

State Agency: Texas

Agency Status:

Date of Visit: 06/04/2012 - 09/28/2012

Agency Representative: Ms. Polly McDonald, Director Pipeline Safety Division

PHMSA Representative: Mr. Patrick Gaume, State Liaison Representative, PHMSA

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

Name/Title: The Honorable Barry T. Smitherman, Chairman

Agency: Railroad Commission of Texas

Address: 1701 North Congress Ave., PO Box 12967

City/State/Zip: Austin, Texas 78711-2967

Rating:

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

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.

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 Accident Investigations
F Damage Prevention
G Field Inspections
H Interstate Agent State (if applicable)
I 60106 Agreement State (if applicable)

10 10
15 15
43 38
14 14
9 9
8 8
12 12
0 0
0 0

TOTALS

111 106

State Rating

95.5

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

Evaluator Notes:

A1. YES. The TX database is a live system. The data upload used to populate Attachment 1 was run on Jan 3, 2012. It is consistant with TRC records. Item of note: The data upload to populate Attachment 3 was run on March 9, 2012 due to both a TRC programming error and a FedStar glitch. During that time 7 Intrastate Trunkline Units were added. Attachment 1 shows 219 units and Attachment 3 shows 226 units. The rest of the report is consistent.

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

A2. YES. The inspector field days are a roll up of actual field hours worked from the time sheets

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

A3. Yes. Attachment 3 is consistent with attachment 7 and TRC records.

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

A4. YES. The significant accidents were reported and other accidents were reported that were considered significant by either the TRC or the operator.

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| 5 | Accuracy verification of Compliance Activities - Progress Report Attachment 5 (A1e)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

A5. YES. The PES database is the source for violations and compliance actions. The fines are from a spreadsheet that captures 'Agreed Orders' from legal.

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

Evaluator Notes:

A6. Yes. Each report was known and each is kept either electronically, in paper file, or combination paper & electronic.

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

A7. Yes, Attachment 7 is consistent with the TQ online reports.

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|----------|---|---|---|
| 8 | Verification of Part 195,198,199 Rules and Amendments - Progress Report Attachment 8 (A1h)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

A8. Yes. Texas has adopted or is within the three year time to adopt for all regulations in CY 2011

9	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:

A9. YES. Attachment 10 details several identified performance goals and metrics.

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

Evaluator Notes:

A10. Activities other than NAPSRS Committees include: A study of composite wrap repairs that are proposed as the next generation beyond 'Armour All' that could be applied to either steel or plastic pipe; and digital X-Rays for forensic studies as well as NDT of construction or repair welds of both PE (both high density & medium density) and steel pipe. In 2011 the Pipeline Safety Division received three Foreign delegations (Hungarian, Chinese, & French) and discussed and showed pipeline safety issues and practices that were common to their nations and Texas. After visiting in Texas, the French delegation visited with PHMSA in Washington DC. During April, 2011, Texas participated in National Safe Digging month by giving educational pipeline awareness presentations in each of 5 cities in the lower Rio Grande Valley area.

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



PART B - Program Inspection Procedures

Points(MAX) Score

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|----------|--|---|---|
| 1 | Standard Inspections (B1a)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

Evaluator Notes:

B1. Yes. The policy states that unit inspections will not exceed 5 calendar years.

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|----------|--|---|---|
| 2 | IMP Inspections (B1b)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

Evaluator Notes:

B2. Yes. Policy states that the inspections will not exceed 5 years. IMP-see SOP 17B, 1st paragraph. TX 16 TAC 8.101.

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|----------|---|---|---|
| 3 | OQ Inspections (B1c)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

B3. Yes. Policy states that the inspections will not exceed 5 calendar years. OQ-see SOP 16B, Inspection Frequency.

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|----------|--|---|---|
| 4 | Damage Prevention Inspections (B1d)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

B4. Yes. Policy states that the inspections will not exceed 5 calendar years. Damage Prevention-see SOP 7B.

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|----------|--|---|---|
| 5 | On-Site Operator Training (B1e)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

B5. Yes. Policy states that operator training is an intergral part of all inspections and as requested by operators. Oper Training-see SOP 23B-On-Site Operator Training.

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|----------|---|---|---|
| 6 | Construction Inspections (B1f)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

B6. Yes. TX regulation requires 30 day advance notice of new constr & The filing of Form PS 48, which allows the scheduling of Construction inspections as staff loads allow. Constr-see SOP 24B & TX 16 TAC 8.115.

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

Evaluator Notes:

B7. Yes. The decision to make on-site investigations is made by supervisors. All reportable incident/accident will include telephonic and written reports. incident/accident-see SOP 22B & SOP 20B

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|----------|---|---|---|
| 8 | Does inspection plan address inspection priorities of each operator, and if necessary each unit, based on the following elements? (B2a-d, G1,2,4)
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 area, 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, See SOP 6B for Length of time requirements, See PES 'Risk Factors' and 'Inspection Frequency' spreadsheets for previous violation count, population density, customer count, material type, loss & unaccounted gas, class location, off shore, HVL, ID>10", outside of time frequency, recommended inspection intervals by priority and type.

9 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

B9. The Pipeline Evaluation System (PES) is in its fourth year of operation, and has been in Phase II for a year. PES now has more online data entry forms and details on accidents and incidents and inspector weekly work reports. Personnel training and qualification continue to be an area of focus as the staff reached the full complement of 31 field inspectors and then suffered 4 resignations. In 2011 & 2012 there have been 3 new hires and Authorized FTE has increased from 31 to 33 inspectors.

Construction in the Barnett Shale continues to be active and a new play called the Eagle Ford Shale in South Texas (about 70 miles SW of San Antonio) has become active.

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? 5 5
Yes = 5 No = 0

A. Total Inspection Person Days (Attachment 2):
624.00

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person
Years) (Attachment 7):
 $220 \times 3.46 = 760.28$

Ratio: A / B
 $624.00 / 760.28 = 0.82$

If Ratio ≥ 0.38 Then Points = 5, If Ratio < 0.38 Then Points = 0
Points = 5

Evaluator Notes:

C1. YES. 624 field days, 3.46 inspector-years, $624/(3.46 \times 220) = .820$. $.820 > .38$ okay.

- 2 Has each inspector and program 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 IMP Training before conducting inspection as lead | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c. | Root Cause Training by at least one inspector/prgram 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 have attended all T&Q core courses or are on the waiting list, and the new inspectors are taking courses and are scheduled for the rest.

State- all Inspectors are HAZWOPER certified and defensive driving trained. About half of the inspectors are H2S certified. In 2009, all hands took or renewed their HAZWOPER, and received instruction in using the new 'PES' database. In July, 2011 an All Hands meeting focused on accident investigation, DIMP, and the State facility replacement rule. HAZWOPER refresher was given to all.

Operators ? training in PS 95 reporting of leak repairs (state requirement & state database), GIMP & DIMP training, and damage prevention program were all presented in the June, 2011 Lake Conroe Pipeline Safety Seminar with PHMSA T&Q and the TGA.

Non-operator/public ? Made presentations about Pipeline Safety to the Houston City Council, Port Arthur Local Emergency Planning Comm, , at an International technology conference, at the UT School of Business, met, talked, toured with three foreign delegations, and with the fed GAO.

- 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. The Program Manager & the records review show a professional knowledge of the regulations.

- 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. A one week forbearance was granted due to the untimely resignation and departure of the TRC Chairman. The reply was actually within the 60 day requirement.

- 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, in Corpus Christi in June, 2010, & with LA & MS in July, 2010; In Lake Conroe in June, 2011, and joint with LA in July, 2011. The new practice is to request a seminar almost every year.

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|----------|---|---|---|
| 6 | Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1 (B3)
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 3 |
|----------|---|---|---|

Evaluator Notes:

C6. . NI 3 pts. Certain OQ and IMP work has not been completed per State Procedures; specifically, some OQ and IMP inspections were not done or were not loaded into the IMDB databases.

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|----------|---|---|---|
| 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 | 1 |
|----------|---|---|---|

Evaluator Notes:

C7. N.I. 1 pt.; Some inspections were not completed or were completed incorrectly. See Insp # 104685, 103818, 103834, 104758, 104633, and 105103.

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|----------|---|---|---|
| 8 | Did the state review operator procedures for determining areas of active corrosion on liquid lines in sufficient detail? (NOTE: PHMSA representative to describe state criteria for determining areas of active corrosion) (B7)
Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

C8. Yes, it is part of the standard inspection, & it is on the liquid inspection check list.

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|----------|--|---|---|
| 9 | Did the state adequately review for compliance operator procedures for abandoning pipeline facilities and analyzing pipeline accidents to determine their causes? (NOTE: PHMSA representative to describe state criteria for determining compliance with abandoning pipeline facilities and analyzing pipeline accidents to determine their causes) (B8)
Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

Evaluator Notes:

C9. Yes, review operator procedures during standard inspection, and is part of the pipeline abandonment approval process.

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|-----------|---|---|---|
| 10 | Is the state aware of environmentally sensitive areas traversed by or adjacent to hazardous liquid pipelines? (reference Part 195, review of NPMS) (B9)
Yes = 1 No = 0 | 1 | 1 |
|-----------|---|---|---|

Evaluator Notes:

C10. Yes. Safety Division uses NPMS and an in-state mapping system to monitor & compare with operator maps.

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|-----------|---|---|---|
| 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 195.402(c)(5)? (B10,E5)
Yes = 1 No = 0 | 1 | 1 |
|-----------|---|---|---|

Evaluator Notes:

C11. Yes it is on the Hazardous Liquid standard inspection form, and is reviewed during every Std Insp. Review of accident records and failure records to discover causes of failure is a major duty of the Damage Prevention Staff.

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| 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 (G5-8,G15)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|---|---|---|

Evaluator Notes:

C12. Yes. The reports are compared against the Operator's pipeline permit, the Federal Operator ID, and against PES. The Annual Reports are used to track leak reports, unaccounted for losses, and histories. ALL distribution system and plastic transmission & gathering repaired leaks in Texas must be reported twice a year into an on-line system. This information is

then analyzed for a whole spectrum of trends. In addition, TRC has full access to DIRT, which provides additional data resources.

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| 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 (G9-12)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 1 |
|-----------|---|---|---|
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Evaluator Notes:

C13. NI, 1 pt. IMP inspections have been uploaded and Many OQ inspections have been uploaded, however, recent OQ since 2009 have NOT been uploaded into IMDB. A Plan will be developed for uploading the backlog of data.

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| 14 | Has state confirmed intrastate operators have submitted information into NPMS database along with changes made after original submission? (G13)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

C14. Yes, NPMS updates are linked with the annual pipeline permit renewals. Unit maps are compared against NPMS during Unit inspections.

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

C15. Yes, is part of every Std Insp. I recommended the use of the D&A Long Form (Form 3.1.11) during HQ O&M inspections.

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| 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 195 Part G (I4-7)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

C16 Yes, TRRC has OQ inspected every Operator and is in the process of Re-inspecting all Operators. I observed that PES is used to document OQ verifications.

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| 17 | Is state verifying operator's hazardous liquid integrity management (L IMP) Programs are up to date? This should include a previous review of LIMP 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 195.452 Appendix C (C8-12)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 1 |
|-----------|--|---|---|
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Evaluator Notes:

C17. NI 1 pts. A review of IMDB indicates that initial LIMP have been done, including those operators which only required protocol 1, but the re-inspections are outside of the 5 yr re-inspection interval per the SOP. It appears that the re-inspections represent a large amount of work, and may require a multiple year effort to become fully current in their inspection cycle.

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| 18 | 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 195.440 (I13-16)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|---|---|---|
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Evaluator Notes:

C18. Yes, TRRC participated in the Clearing House activity, & has contacted every Operator. New Operators are being directed to develop public awareness plans. Until 2011, Public Awareness was addressed during Std Inspections. During 2011 certain TRC staff received PAPEE training, and then participated in three HQ PAPEI inspections.

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|----|--|---|---|
| 19 | 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). (G19-20) | 1 | 1 |
| | Yes = 1 No = 0 Needs Improvement = .5 | | |

Evaluator Notes:

C19. Yes, through a well-designed web site, numerous Damage Prevention Seminars, & periodic informational mail outs. In addition, all records are public open records, and many can be accessed on-line.

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|----|---|---|---|
| 20 | 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:

C20. Yes, SRCR are handled by Steven Rios in 2011 & 2012. Monitoring of SRC are current.

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|----|--|---|---|
| 21 | Did the state participate in/respond to surveys or information requests from NAPSRS or PHMSA? (H4) | 1 | 1 |
| | Yes = 1 No = 0 Needs Improvement = .5 | | |

Evaluator Notes:

C21. Yes, TRRC is an active participant in NAPSRS.

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|----|-----------------------|-----------|-----------|
| 22 | General Comments: | Info Only | Info Only |
| | Info Only = No Points | | |

Evaluator Notes:

C22. For the distribution operations, the Leak Repair Data Form (PS-95) was fully implemented and operators are using it for CY2011. As a result of data filed, Commission staff has implemented a distribution facility replacement program. The program also requires Operators to manage the issues identified through the leak repair data reports and are now filing annual reports detailing prior year progress plus coming year agenda. Personnel training and qualification continue to be an area of focus as the staff has just recently reached the full complement of 33 field inspectors.

Construction in the Barnett Shale continues to be active and a new play called the Eagle Ford Shale in South Texas (about 70 miles SW of San Antonio) has become active.

The Texas Damage Prevention program appears to be improving safety and awareness. In calendar year 2011 through present, personnel participated in 49 events throughout the state making Safe Digging presentations and providing regulatory resource assistance on safety standards or best practices. Overall 'line Hits' per thousand line locate requests were 4.92 hits/1000 in 2011.

The proposed use for the 2011 suspension funds grant will provide for the next upgrade of your Pipeline Evaluation System (PES), and for further development of your Texas Damage Reporting Form (TDRF); including hiring two contract employees to work full time on this project.

Total points scored for this section: 38
Total possible points for this section: 43



PART D - Compliance Activities

Points(MAX) Score

- 1 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) 4 4

Yes = 4 No = 0 Needs Improvement = 1-3

- a. Procedures to notify an operator (company officer) when a noncompliance is identified Yes ☒ No ☐ Needs Improvement ☐
- b. Procedures to routinely review progress of compliance actions to prevent delays or breakdowns Yes ☒ No ☐ Needs Improvement ☐

Evaluator Notes:

D1. Yes. See SOP 19A ? It is detailed guidance that directs letters to be sent to Corporate Officers, and directs the path of a PV from beginning to end. Also see Pipeline Evaluation System (PES) Appendices A, B, C, & D.

- 2 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) 4 4

Yes = 4 No = 0 Needs Improvement = 1-3

- a. Were compliance actions sent to company officer or manager/board director if municipal/government system? Yes ☒ No ☐ Needs Improvement ☐

Evaluator Notes:

D2. Yes, at this point, the information is increasingly residing in PES, and also in the paper files. Records are retained at 4 years plus current. An item of note; in the case of some Master Meters & municipal systems, two letters will be sent, one to the Owner / Mayor, and the other to the Operating Manager.

- 3 Did the state issue compliance actions for all probable violations discovered? (B15) 2 2

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

D3. Yes, all probable violations are addressed in writing per Standard Procedures (SOP 19A). In addition the violation counts are found in the Liquid Certification, attachment 5 summary page.

- 4 Did compliance actions give reasonable due process to all parties? Including "show cause" hearing if necessary. (B17, B20) 2 2

Yes = 2 No = 0

Evaluator Notes:

D4. Yes, there were some administrative enforcement actions in 2011, resulting in \$60,500 assessed and \$60,500 in collected administrative penalties for Gas. For Hazardous Liquid, it was \$8587.50 Assessed & collected. Damage Prevention fines were \$1,637,738 total in 2011. Due process is afforded all & is stated in the violation letters.

- 5 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) 2 2

Yes = 2 No = 0

Evaluator Notes:

D5. Yes, The Program Manager is familiar with state process for imposing civil penalties. The processes for using civil penalties are understood and used.

- 6 Can the State demonstrate it is using their enforcement fining authority for pipeline safety violations? (new question) Info Only Info Only

Info Only = No Points

Evaluator Notes:

D6. Yes, The TRC uses civil penalties as an integral part of their resources to achieve compliance with the regulations.

- 7 General Comments: Info Only Info Only

Info Only = No Points

Evaluator Notes:

D7. The Pipeline Evaluation System (PES) is in its fourth year of operation, and has moved to Phase III to include more

online data entry forms; including federal forms and report formats for the incident tab.

Special project teams were implemented for FY 2012 to address Drug & Alcohol, O&M, Public Awareness, Damage Prevention, New Construction, OQ, DIMP and IMP Specialty Inspections. Scheduled for the future are Control Room Management Specialty Inspections.

Prior to performing evaluations or inspections, (IMP, Breakout Tank, O&M, Incident investigations, etc.) and at the operators' request, training is given to operating and maintenance personnel that will be involved in the inspections or evaluations. This training has proven to increase safety and reduce violations. It also enhances the knowledge of the operator's personnel and provides them with a better understanding of the written procedures and processes that are needed to answer the questions; "who, what, where, when, how and why". These classes also assist in achieving a more effective and valuable evaluation or inspection for both the inspector and the operator.

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



PART E - Accident Investigations

Points(MAX) Score

- 1 Does state have adequate mechanism to receive and respond to operator reports of accidents, 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. Appendix C of the State Guidelines specifies 1. Determine if safety violations occurred. 2. Determine root causes of the accident if asked by NTSB. 3. Cooperate with NTSB. The MOU between NTSB and OPS is understood, and RRC fully cooperates with NTSB. TRC has a full time employee to keep track of incident notifications. Also have an after-hours answering service.

- 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, See PES, Incident tab. All incidents are checked by phone, and determination is made for an on-site visit. All of the federally reportable incidents that the RRC was notified about had a field visit.

- 3 Were all accidents 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 where appropriate Yes ☒ No ☐ Needs Improvement ☐

Evaluator Notes:

E3. Yes, RRC uses PES Incident Report for accident investigations, and supplements with Federal Form 11. The events are documented and Appendix C is followed. Including findings of fact, probable cause, and determine if Regulations were followed.

- 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, hundreds of violations are issued every year. When violations are found, a violation letter is generated and follow up is done. Civil penalties are assessed when appropriate, typically for repeat violations.

- 5 Did the state assist region office by taking appropriate follow-up actions related to the operator accident 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 1
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

E5. Yes, the Pipeline Safety Division has almost daily contact with PHMSA SW Region and DC to ensure that incident reports are accurate & updated. The reports are reviewed for completeness & to ensure that a final report is submitted. If PV are found they are communicated to the SW Region office.

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

Evaluator Notes:

E6. Yes, the White paper report on non-restraint compression couplings, and Third party hit reports, the PPAHHC Forum (plastic pipe ad hoc advisory committee), and the Texas report at the SW Region Meeting.

7 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

E7. Incidents continue to be a highly visible issue for the Commission. Incident reporting and tracking have been migrated into the PES system and became active in February 2010. Pipeline operators and excavators are using the on-line damage prevention excavation incident reporting programs. The Commission has seen another reduction of the number of 3rd party hits in 2011, particularly as expressed as line hits per 1000 locate requests. The Commission has adopted rules for distribution operators for leak survey, leak grading, and leak reporting to help find leaks and repair them prior to the incident. As a result of data filed, Commission staff has implemented a distribution facility replacement program to manage the issues identified through the leak repair data reports.

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



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? (E1) | 2 | 2 |
| Yes = 2 No = 0 Needs Improvement = 1 | | | |

Evaluator Notes:

F1. Yes, Texas is very aware of this and has investigated incidents/accidents related to boring. This is a priority review with Texas; it is on Texas' insp check list & is part of the Excavation Damage Review (DIRT).

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

Evaluator Notes:

F2. Yes, The Operator has to self-report its excavation plans and results into the Texas on-line reporting system it and includes line marking and One-call. These reports are verified during Std and Damage prevention inspections. The Federal Forms are used for Standard Inspections.

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

Evaluator Notes:

F3. Yes, RRC participated in 35 damage prevention seminars. The damage prevention rule extending authority over excavators has been in effect for over four years and awareness of the rule continues to expand. At present, TX has a law that names several CGA best Practices, The RRC Regulation names 10 additional CGA best practices, and the Damage Prevention Program staff is very active in enforcing Damage Prevention. There is pending regulation to require that 10 additional CGA best practices be followed.

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

Evaluator Notes:

F4. Yes, The Damage Prevention Staff is getting the raw numbers of one-calls and line hits from One-call and the on-line reporting site, and is doing follow-up on almost every damage report that is filed. For CY 2011 the raw data shows 9,271 hits, 15,435 hit reports, and 1,885,495 one-calls. TRRC was an early user of DIRT, & has their own version of Virtual DIRT.

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

Evaluator Notes:

F5. The TX damage prevention program is proving to be effective in raising One-Call awareness and reduce line hits. Damage prevention has twelve staff. The September 2007 through August 2012 total for fines in damage prevention has grown to \$5.7 million, and most fines will continue to be cited at \$1,000 per violation. Now that the Damage Prevention regulations have been in effect for several years, the fines will increase effective August 27, 2012 to the \$2,000 to \$2,500 range per assessed violation. Operator and excavator training, effective treatment of repeat offenders, and adoption of more Best Practices such as Ticket life, and ownership of the Dig ticket, are just some of the areas that continue to be developed.

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:

COPANO ENERGY opid 31926

Name of State Inspector(s) Observed:

Samuel Copeland, TX RRC-Houston Region-Pipeline

Location of Inspection:

Independence & Columbus, TX

Date of Inspection:

9/13-14/12

Name of PHMSA Representative:

Patrick Gaume, State Liaison, PHMSA

Evaluator Notes:

G1. COPANO ENERGY opid 31926

Samuel Copeland, TX RRC-Houston Region-Pipeline

Independence & Columbus, TX

9/13-14/12

Patrick Gaume, State Liaison, PHMSA

This was a Standard Inspection using the most recent Federal Form

- 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, Copano was contacted & 3 COPANO employees participated in the inspection.

- 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, This was a Standard Inspection using the most recent Federal Form.

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

Evaluator Notes:

G4. Yes, every question was addressed.

- 5 Did the inspector check to see if the operator had necessary equipment during inspection to conduct tasks viewed? (Maps, valve keys, half cells, etc) (F5) 1 1
Yes = 1 No = 0

Evaluator Notes:

G5. Yes.

- 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:

G6. Yes, The portion I Evaluated was the Field inspection. There were indications that procedures and records had been reviewed as well.

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:

G7. Yes, Mr. Sam Copeland demonstrated good and adequate knowledge of the pipeline safety.

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:

G8. Yes. He conducted a cordial, professional, and thorough exit interview.

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:

G9. Here is a summary of the findings in Copano NGL Inspection. The first part is records review and the second part is the finding from the field which I observed.

Copano Liquids Records Review

1. Accident Reporting ? Procedure needs to include supplemental and final reports (195.54)
2. No procedure for identifying Operator ID for feds or state (195.64)
3. No procedure requiring pipelines to be constructed and designed to accommodate internal inspection devices (195.120)
4. Procedure lacking a process of company personnel verifying NDT process (195.234)
5. Pressure test procedure did not address all records to be kept in 195.310
6. Accidental Analysis procedure needs to address operator or human error (195.402(c)(5))
7. Startup and shutdown procedure needs to reference the right section, references section 8&9 but it was in 6&7 (195.402(c)(7))
8. Abnormal conditions procedures need to define periodically reviewed (195.402(d)(5))
9. Maps and records procedures need to address construction records and operating history (195.404)
10. SCADA procedures did not reference CRM manual for the right procedure (195.406(b))
11. Patrolling procedure did not reference the right form (195.412(a))
12. Pig launcher procedure, did not see requirements for relief device and their proper use (195.426)
13. Security of facility procedures needs to include and define "other exposed facilities" per 195.436
14. CRM manual was not referenced in the O&M (195.134)
15. No procedure for corrosion control supervisor (195.555)
16. No procedure for after a conversion of service or new pipeline when a cp system will be operational (195.563)
17. No procedure to determine when CIS or comparable technology is practicable before 2 years (195.573(a)(2))
18. Rectifier inspection needs to reference the right forms (195.573(c))
19. No procedure for correcting identified deficiencies in corrosion control(195.573(e))
20. No procedure for cp isolation (195.575)
21. Wall loss procedures need a reporting criteria of when to report to supervisor or engineer so that RSTRENG might be conducted (195.585)
22. No procedure on guidance for RSTRENG (195.587)

Copano Liquids Field Review

1. No forms in the O&M were used in the field (195.402)
2. Drug & Alcohol poster not posted in El Campo Office (199.113(b))
3. Procedure on operating valve needs to reflect the operations in the field (certain steps like call control center before operating valve were missing) (195.402) (195.509)
4. Brenham line
 1. Pig Receiver (End of the Line)
 - a. Safety chain not attached (195.426)
 - b. Pipe support was not engaged (195.110)
 - c. Air to soil interface was not properly coated (195.583)
 - d. Atmospheric corrosion on bottom of the pig receiver (195.581)
 2. Test lead on North Side of Hwy 90

- a. Line marker of the right of way not visible (195.410)
5. Sheridan Line
1. Line marker or sign needed at the valve at the mainline block valve on FM 3013 (195.410)
2. Fondren Block Valve
 - a. Atmospheric corrosion on the valve (195.581)
 - b. Flange assembly inadequate, bolts not all the way threaded (195.126)
 - c. Pipe support was not engaged (195.110)
3. Line marker was not present on the right of way leaving fondren mainline block valve (195.410)

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

- | | |
|--------------------------------------|-------------------------------------|
| a. Abandonment | <input type="checkbox"/> |
| b. Abnormal Operations | <input type="checkbox"/> |
| c. Break-Out Tanks | <input checked="" 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 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 type="checkbox"/> |
| p. MOP | <input checked="" 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 checked="" type="checkbox"/> |
| v. Overpressure Safety Devices | <input 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 checked="" 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:

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

PART H - Interstate Agent State (if applicable)**Points(MAX) Score**

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

Evaluator Notes:

NA. TX is not an interstate agent.

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

Evaluator Notes:

NA. TX is not an interstate agent.

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

Evaluator Notes:

NA. TX is not an interstate agent.

- | | | | |
|----------|--|---|----|
| 4 | 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)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

NA. TX is not an interstate agent.

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

Evaluator Notes:

NA. TX is not an interstate agent.

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

Evaluator Notes:

NA. TX is not an interstate agent.

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

Evaluator Notes:

NA. TX is not an interstate agent.

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|----------|--|-----------|-----------|
| 8 | General Comments:
Info Only = No Points | Info Only | Info Only |
|----------|--|-----------|-----------|

Evaluator Notes:

NA. TX is not an interstate agent.

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

PART I - 60106 Agreement State (if applicable)**Points(MAX) Score**

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

Evaluator Notes:

NA. TX is a 60105 partner.

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

Evaluator Notes:

NA. TX is a 60105 partner.

- | | | | |
|----------|---|---|----|
| 3 | 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)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

NA. TX is a 60105 partner.

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

Evaluator Notes:

NA. TX is a 60105 partner.

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

Evaluator Notes:

NA. TX is a 60105 partner.

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

Evaluator Notes:

NA. TX is a 60105 partner.

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|----------|--|-----------|-----------|
| 7 | General Comments:
Info Only = No Points | Info Only | Info Only |
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Evaluator Notes:

NA. TX is a 60105 partner.

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