



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

1200 New Jersey Avenue SE
Washington DC 20590

2014 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)



2014 Gas State Program Evaluation -- CY 2014

Gas

State Agency: New Mexico

Agency Status:

Date of Visit: 04/07/2015 - 04/28/2015

Agency Representative: Jason N. Montoya, Pipeline Safety Bureau Chief
Lonnie Montoya, Pipeline Safety Inspector

PHMSA Representative: Glynn Blanton, USDOT/PHMSA, State Programs

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

Name/Title: Karen L. Montoya, Chairwoman

Agency: New Mexico Public Regulation Commission

Address: 1120 Paseo de Peralta, 4th Floor, PO Box 1269

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

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 2014 (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

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)

Possible Points Points Scored

10 9.5
13 13
46 45
15 15
11 11
8 8
12 12
0 0
0 0

TOTALS

115 113.5

State Rating

98.7

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
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 0.5 |
|---|---|---|-----|

Evaluator Notes:

A review of Progress Report Attachment 1 found the number of units inspected for the Municipal systems was incorrectly entered. The number of units inspected should be 2 not 20. This information was verified by reviewing inspection reports. A loss of half a point occurred. We will need to have the Program Manager or Carrie Winslow, PHMSA State Program, correct this mistake in FedSTAR.

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|---|--|---|---|
| 2 | Review of Inspection Days for accuracy - Progress Report Attachment 2
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|--|---|---|

Evaluator Notes:

A review of Attachment 2 found the information was correct. Discussion with Program Manager on activities for Damage Prevention, follow-up and Integrity Management inspections were reviewed. It was suggested a response time be included and stated in the Pipeline Safety Program Standard Operating Procedures to match the agency's time of 15 days from NOPV.

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

Evaluator Notes:

A review of Attachment 3 found the information was correct. The number of inspection units on attachment 3 matched the number of units on Attachment 2. No issues.

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

Evaluator Notes:

Yes, a review of Attachment 4 found the incident information was correct. No issues.

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|---|--|---|---|
| 5 | Accuracy verification of Compliance Activities - Progress Report Attachment 5
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|--|---|---|

Evaluator Notes:

Reviewed and verified Attachment 5 number of probable violations were correct. Noted the number of carryovers violations have been reduced from previous year. Continue to work on reducing the number of carryovers.

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

Evaluator Notes:

Yes, reviewed program files, spreadsheets and data base information and found information was well-organized. No issues.

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

Evaluator Notes:

Yes, a review of TQ transcript confirms all inspectors are qualified and meet the training requirements. No issues.

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|---|---|---|---|
| 8 | Verification of Part 192,193,198,199 Rules and Amendments - Progress Report Attachment 8
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|---|---|---|

Evaluator Notes:

Verify all federal regulations have been adopted within the 24 months. Noted the civil penalty amount is still below the federal amount. Current civil penalty is \$25,000 per violation to a maximum amount not to exceed \$500,000. New Mexico legislators only consider civil penalty or law changes every two years.

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

Evaluator Notes:

Reviewed planned and past performance accomplishments and encourage more information on future filings. No issues.

- 10** General Comments: Info OnlyInfo Only
Info Only = No Points

Evaluator Notes:

Loss of half a point occurred on Question A.1

The number of units inspected for the Municipal systems was incorrectly entered. The number of units inspected should be 2 not 20. This information was verified by reviewing inspection reports. We will need to have the Program Manager or Carrie Winslow, PHMSA State Program, correct this mistake in FedSTAR.

Total points scored for this section: 9.5
Total possible points for this section: 10



PART B - Program Inspection Procedures

Points(MAX) Score

- | | | | |
|---|--|---|---|
| 1 | Standard Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 2 | 2 |
|---|--|---|---|

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, this is listed in the New Mexico Pipeline Safety Program Standard Operating Procedures, Section 1, subsection V-Procedures for Determining Inspection Priorities and subsection VI-Procedures for Selecting Large Operator Inspection Unit Rotation. No issues.

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|---|--|---|---|
| 2 | IMP and DIMP Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 1 | 1 |
|---|--|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes, this is listed in the New Mexico Pipeline Safety Program Standard Operating Procedures, Section 1, subsection V-Procedures for Determining Inspection Priorities. No issues.

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|---|--|---|---|
| 3 | OQ Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 1 | 1 |
|---|--|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes, this is listed in the New Mexico Pipeline Safety Program Standard Operating Procedures, Section 1, subsection V-Procedures for Determining Inspection Priorities. No issues.

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|---|---|---|---|
| 4 | Damage Prevention Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 1 | 1 |
|---|---|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes, this is listed in the New Mexico Pipeline Safety Program Standard Operating Procedures, Section 1, subsection V-Procedures for Determining Inspection Priorities, page 5. No issues.

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|---|--|---|---|
| 5 | Any operator training conducted should be outlined and appropriately documented as needed. | 1 | 1 |
|---|--|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes, this is listed in the New Mexico Pipeline Safety Program Standard Operating Procedures, Section 3, subsection IV page 9. No issues.

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|---|--|---|---|
| 6 | Construction Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 1 | 1 |
|---|--|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes, this is listed in the New Mexico Pipeline Safety Program Standard Operating Procedures, Section 1, subsection V-Procedures for Determining Inspection Priorities, (I), page 5. No issues.

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|----|---|--------------------------------------|--|
| 7 | Does inspection plan address inspection priorities of each operator, and if necessary each unit, based on the following elements?
Yes = 6 No = 0 Needs Improvement = 1-5 | 6 | 6 |
| a. | Length of time since last inspection (Within five year interval) | 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 <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |

Evaluator Notes:

Yes, items (a thru e) are listed in the New Mexico Pipeline Safety Program Standard Operating Procedures, Section 1; subsection VI-Procedures for Selecting Large Operator Inspection Unit Rotation, page 5. Reviewed inspection units item (f) and found they are broken down correctly. No issues.

8 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

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

Total points scored for this section: 13
Total possible points for this section: 13



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 5 5
Yes = 5 No = 0

A. Total Inspection Person Days (Attachment 2):
375.00

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):
220 X 4.37 = 960.92

Ratio: A / B
375.00 / 960.92 = 0.39

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

Evaluator Notes:

A.Total Inspection Person Days (Attachment 2)= 375

B.Total Inspection Person Days Charged to the program(220*Number of Inspection person years(Attachment 7)=960.92282

Formula:- Ratio = A/B = 375/960.92282 = 0.39

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

Thus Points = 5

- 2 Has each inspector and program manager fulfilled the T Q Training Requirements? (See Guidelines Appendix C for requirements) Chapter 4.4 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"/> |
| e. Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector. | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

a.Two inspectors have not completed all base courses but are scheduled to be completed in CY2015 or CY2016.

b.Yes, Issac Lerma, Lonnie Montaya & Loretta Cuthrell are the lead inspectors for DIMP, IMP & OQ.

c. Five inspectors have completed the Root Cause course at TQ.

d. Outside training was provided to all inspectors on Excel software.

e. Three of the five inspectors (Issac Lerma, Lonnie Montaya & Loretta Cuthrell) have obtained the minimum qualifications to lead any applicable standard inspection.

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

Evaluator Notes:

Yes, Jason Montoya has over five years' experience as the program manager, a professional engineer, ten years' experience in Gas and hazardous liquid safety. He has successfully completed all the TQ courses. No issue.

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

Evaluator Notes:

Yes, the Chairman's letter was received on January 20, 2015. No issue.

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

Evaluator Notes:

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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
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
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Evaluator Notes:

Yes, a review of CY2014 Inspection Assignments spreadsheet lists all operators and date of the inspections. This spreadsheet was compared to the New Mexico Pipeline Safety Program Standard Operating Procedures, Section 1, subsection V- Procedures for Determining Inspection Priorities. It was found each inspection unit was inspected for the type of inspection required and within the time intervals listed in their procedures. No issue.

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

Yes, they use the Federal forms for all types of inspections. However, the location of the forms are not listed in their Standard Operating Procedures. Improvement is needed in providing guidance to the location of these forms in their procedures document. Although this is a minor item, no loss of points occurred during this review.

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| 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
Yes = 1 No = 0 | 1 | 1 |
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Evaluator Notes:

Yes, this item is listed in the Federal Inspection form and asked during the inspection visit.

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| 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
Yes = 1 No = 0 | 1 | 1 |
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Evaluator Notes:

Yes, they use the Federal forms for their inspections and this is listed in the form.

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| 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
Yes = 1 No = 0 | 1 | 1 |
|-----------|---|---|---|
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Evaluator Notes:

Yes, this item is listed on the federal gas distribution standard inspection form.

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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 192.617? Chapter 5.1
Yes = 1 No = 0 | 1 | 1 |
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Evaluator Notes:

Yes, this item is listed on the federal gas distribution standard inspection form.

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

NM PRC staff members review and check each operator's annual and incident reports for accuracy of information, but they do not perform an analysis or trend the results. Improvement is needed in conducting an analysis and trending the information which provides data on rank risking inspections. Therefore, a loss of one point occurred.

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

Evaluator Notes:

Yes, a review of OQ & IMP website found ten OQ & fourteen IMP inspections were uploaded into the data base. No issues or areas of concern.

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

Evaluator Notes:

Yes, this item is covered and discussed with the operator using the Federal standard inspection form.

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

Evaluator Notes:

Yes, in CY2014 seventeen drug and alcohol inspections were performed using the federal form. All positive tests were checked in accordance with the operator's program. No issues.

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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 192 Part N | 2 | 2 |
|-----------|---|---|---|

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, this is listed in the New Mexico Pipeline Safety Program Standard Operating Procedures, Section 1, subsection V- Procedures For Determining Inspection Priorities. Protocol 9 inspections are conducted on each inspection unit in a three year cycle.

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

Evaluator Notes:

Yes, this is listed in the New Mexico Pipeline Safety Program Standard Operating Procedures, Section 1, subsection V- Procedures For Determining Inspection Priorities. These inspections are performed every five years. During the standard inspection, the inspector reviews the operator's updates to their IMP plan, remedial action taken and requests a copy of these items for their file. No issues.

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

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, DIMP inspections were completed by December, 2013. During a standard inspection the inspector is asking the operator if any updates have occurred to their DIMP plan and requesting a copy of the information. This information is recorded in the inspection form comment or note section. No issues.

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| 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) PAPEI Effectiveness Inspections should have been completed by December 2013
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

Yes, all Public Awareness reviews were completed before December, 2013. A review of files and database spreadsheet confirmed this was completed. No issues.

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

Evaluator Notes:

Yes, New Mexico Public Regulation Commission uses their website as a means to communicate with their stakeholder groups on changes and requirements pertaining to pipeline safety. New Mexico Public Regulation Commission website address is <http://nmprc.state.nm.us>.

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

Yes, a review of files found one safety related condition was filed in CY2014. The operator was Enterprise Product Operating LLC. The condition report was follow-up and closed on February 6, 2015 by Jason Montoya. No issues.

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

Yes, this item is listed in their Standard Inspection Addendum sheet. A review of inspections found this item is being performed. No issues.

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| 23 | Did the state participate in/respond to surveys or information requests from NAPSRS or PHMSA?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

Yes, NAPSRS surveys and questions from other state agencies. No areas of concern.

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|----|--|---|---|
| 24 | If the State has issued any waivers/special permits for any operator, has the state verified conditions of those waivers/special permits are being met? This should include having the operator amend procedures where appropriate.(New Question for CY2013, no points until CY2015 evaluation conducted in CY2016)
Info Only = No Points | 0 | 0 |
|----|--|---|---|

Evaluator Notes:

A review of PHMSA Website pertaining to special permits found two waivers. The waiver requests were discussed with program manager. According to Jason Montoya the waiver issued on October 31, 2013 needs to be removed. Advised Jason Montoya to send an email or letter to John Gale, PHMSA Regulation & Rules Division, requesting the waiver be withdrawn. Mr. Gale's email address is John.Gale@dot.gov

The other waiver pertaining to the installation of PA 11 is being monitored during each standard inspection of New Mexico Gas Company on a three year cycle. Last inspection performed was October, 2013 and records show this item was checked.

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| 25 | Did the state attend the National NAPSRS Board of Directors Meeting in CY being evaluated? (New Question for CY2014, no points first year)
Info Only = No Points | 0 | 0 |
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Evaluator Notes:

Yes, Jason Montoya attended the 2014 National NAPSIR Meeting in Springfield, IL.

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|-----------|---|---|---|
| 26 | Discussion on State Program Performance Metrics found on Stakeholder Communication site. (question will be rolled up and included as part of Question C12 on future evaluations) http://primis.phmsa.dot.gov/comm/states.htm
Info Only = No Points | 0 | 0 |
|-----------|---|---|---|

Evaluator Notes:

Yes. Discussed with Jason Montoya the website and information on performance metrics to improve their program.

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| 27 | General Comments:
Info Only = No Points | Info Only | Info Only |
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Evaluator Notes:

A loss of one point occurred in this section of the review.

Question C.12

NM PRC staff members review and check each operator's annual and incident reports for accuracy of information, but they do not perform an analyze or trend the results. Improvement is needed in conducting an analyze and trending the information which provides data on rank risking inspections. Therefore, a loss of one point occurred.

Total points scored for this section: 45
Total possible points for this section: 46



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

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|----------|--|---|---|
| 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
Yes = 4 No = 0 Needs Improvement = 1-3 | 4 | 4 |
| a. | Procedures to notify an operator (company officer) when a noncompliance is identified | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. | Procedures to routinely review progress of compliance actions to prevent delays or breakdowns | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

- a. Yes, this is listed in the New Mexico Pipeline Safety Program Standard Operating Procedures, Section 1, subsection VIII
(b). No issues.
b. Yes, Section 1, subsection VIII (c). No issues.

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

Evaluator Notes:

- a. Yes, a review of files and records confirm letters are being sent to company officials or board members of municipal government systems.
b. Yes, a review of files and records confirm violations are documented.
c. Yes, probable violations are resolved by two methods listed in the standard procedure manual.
d. Yes, violations are being reviewed routinely by the Program Manager or supervisor.

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|----------|--|---|---|
| 3 | Did the state issue compliance actions for all probable violations discovered?
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

Evaluator Notes:

Yes, in CY2014 thirty-five compliance actions were taken against nineteen operators.

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|----------|---|---|---|
| 4 | Did compliance actions give reasonable due process to all parties? Including "show cause" hearing if necessary.
Yes = 2 No = 0 | 2 | 2 |
|----------|---|---|---|

Evaluator Notes:

Yes, two of the seventeen operators cited for non-compliance resulted in a civil penalty being assessed and a show cause or settlement hearing being conducted.

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

Evaluator Notes:

Yes, this is demonstrated in the civil penalties assessed against New Mexico Gas Company - Redondo Peak in the amount of \$10,000 and New Mexico Gas Company -Central in the amount of \$25,000. No issues.

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

Evaluator Notes:

Yes, this is demonstrated by the civil penalties assessed and collected from New Mexico Gas Company in CY2014.

7 General Comments:

Info Only = No Points

Info OnlyInfo Only

Evaluator Notes:

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

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



PART E - Incident Investigations

Points(MAX) Score

- 1 Does the state have written procedures to address state actions in the event of an incident/accident? 2 2

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, this is listed in the New Mexico Pipeline Safety Program Standard Operating Procedures, Section 2, Pipeline/Incident/Accident Investigation.

- 2 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 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:

Yes, NM PRC website provides an emergency number for all operators to use in reporting incidents during and after normal working hours. The emergency number is linked into the inspector(s) who are on call. A review of files found in CY2014 one reportable incident, New Mexico Gas Company on August 8, 2014.

a. Yes, this is listed in the New Mexico Pipeline Safety Program Standard Operating Procedures, Section 2, Pipeline/Incident/Accident Investigation, subsection IX, Federal/State Cooperation in Case of Incident/Accident.

b. Yes, this is listed in the New Mexico Pipeline Safety Program Standard Operating Procedures, Section 2, Pipeline/Incident/Accident Investigation, subsection X.

- 3 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 1 1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes, all onsite investigations are performed when an incident or accident occurs. This item is listed in the standard procedures manual. No issues.

- 4 Were all incidents investigated, thoroughly documented, and with conclusions and recommendations? 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:

a-c. Yes, a review of the New Mexico Gas Company incident investigation report dated August 8, 2014, found the Pipeline Incident Report. This report and other relative information clearly demonstrated what was observed and conclusions of fact to what caused the incident. A letter of non-compliance was issued to the operator citing two violations and a fine of \$10,000.

- 5 Did the state initiate compliance action for violations found during any incident/accident investigation? 1 1

Yes = 1 No = 0

Evaluator Notes:

Yes, A letter of non-compliance was issued to New Mexico Gas Company citing two violations and a fine of \$10,000.

- 6 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 1 1
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes, a review of files and emails found communication from Sam Bacenty, PHMSA Southwest Region Engineer, dated December 10, 2014 about the Rio Rancho Incident Report. The report was checked and reviewed by NM PRC and they provided a response to Sam Bacenty on the same day.

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

Evaluator Notes:

Yes, this was accomplished during the NAPS R Southwest Region and New Mexico Gas Association meetings in CY2014.

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

Evaluator Notes:

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

Total points scored for this section: 11
Total possible points for this section: 11



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

Evaluator Notes:

Yes, this item is listed on the NM PRC Addendum Standard Gas/Liquid Inspection form, Damage Prevention Program Procedures.

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

Evaluator Notes:

Yes, this item is listed on Federal Inspection form and NM PRC Addendum Standard Gas/Liquid Inspection form, Damage Prevention Program Procedures.

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

Evaluator Notes:

The state is encouraging and promoting best practices thorough New Mexico Gas Association and New Mexico Regional CGA meetings. To assist in making the Gas operator more aware of the best practices it was suggested additional questions be added to the Standard Gas/Liquid Addendum form.

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

Evaluator Notes:

Yes, this information is being provided to NM PRC from NM 811, Inc. Additionally, NM PRC has access to the One Call database to review all tickets and damages that occur across the State of New Mexico.

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

Evaluator Notes:

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

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 OnlyInfo Only
Info Only = No Points

Name of Operator Inspected:

New Mexico Gas Company

Name of State Inspector(s) Observed:

Lonnie Montoya, Inspector Pipeline Safety Bureau

Location of Inspection:

Roswell, NM

Date of Inspection:

April 27-28, 2015

Name of PHMSA Representative:

Glynn Blanton, PHMSA State Program

Evaluator Notes:

This was a standard inspection on New Mexico Gas Company Distribution & Transmission facilities in Roswell, NM. The following individuals from New Mexico Gas Company were present: Gary Roybal, Manager Compliance; Valerie McCoy, Engineer II; James Mac Cornack, Operations Supervisor; Joseph A. Brady, Operations Supervisor and Santiago Lujan, District Engineer. Additionally, Jason Montoya, Pipeline Safety Bureau Chief was present to observe and assist in the inspection. A brief description of the high pressure transmission line was provided by New Mexico Gas Company representatives.

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

Evaluator Notes:

Yes, New Mexico Gas Company representative of compliance, Gary Roybal, was notified by telephone call on February 24, 2015 from Mr. Lonnie Montoya, NM PRC.

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

Evaluator Notes:

Yes, Lonnie Montoya, Pipeline Safety Inspector, used the Federal standard inspection form 1. Observed the inspector reviewing each question with the operator representatives before requesting a response and completing the form item with a Satisfactory or Unsatisfactory check.

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

Evaluator Notes:

Yes, Mr. Lonnie Montoya asked a lot of questions to verify the operator's information, forms used and procedures followed in performing their maintenance work. He recorded their response into the standard inspection form.

- 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.) 1 1
Yes = 1 No = 0

Evaluator Notes:

Yes, Lonnie Montoya reviewed OQ requirements of each individual that would be performing the covered tasks pertaining to pipe to soil potential readings, combustible gas detection readings, regulator station settings and odorization. He verified the equipment they were using as each task was performed. No areas of concerns were noted or found.

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

- b. Records ☒
- c. Field Activities ☐
- d. Other (please comment) ☐

Evaluator Notes:

- a. A review of New Mexico Gas Company O&M Manual was conducted. Several items were reviewed pertaining to welding procedures and testing. It was determined written procedures pertaining to welding were not available. This was a potential violation of part 192. Company representative will provide documentation to NM PRC.
- b. A review of records was conducted. Information on training and public liaisons found no areas of concern. A review of pressure testing of the transmission line was reviewed and found no areas of concern. A review of leak surveys conducted was checked along with the leak records. No areas of concerns were found.

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

Evaluator Notes:

Yes, Lonnie Montoya has completed all TQ courses on Gas pipeline safety including courses in hazardous liquid safety and has over twelve years of experience. He is an experienced inspector who conducted a thorough audit of the operator. No issues.

- | | | | |
|---|---|---|---|
| 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)
Yes = 1 No = 0 | 1 | 1 |
|---|---|---|---|

Evaluator Notes:

Yes, an exit interview was conducted in the office prior to the field inspection performed along the transmission line. After the field inspection a final exit interview was conducted in the New Mexico Gas Company office. The exit interview was conducted in a professional manner and information on the findings of the inspection were shared with the operator. No violations were found in the field portion of the inspection.

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

Evaluator Notes:

Yes, the operator, New Mexico Gas Company, was cited for violation of 192.705(a) pipeline patrolling. A review of records indicated the operator patrolled their transmission line once a year instead of twice a year as required in class 3 locations.

Additionally, two potential violations or area of concerns were the welding procedures and welding qualification. The operator will provide documentation to NM PRC pertaining to compliance with these two items or be cited for non-compliance.

Under state rules, the operator will be cited for non-compliance for failure to notify NM PRC of the Dexter, NM pipeline construction project. This is a state rule not a federal requirement.

- | | | | |
|----|---|-----------|-----------|
| 10 | General Comments: 1) What did the inspector observe in the field? (Narrative description of field observations and how inspector performed) 2) Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices) 3) Other.
Info Only = No Points | Info Only | Info Only |
|----|---|-----------|-----------|

- a. Abandonment ☐
- b. Abnormal Operations ☐
- c. Break-Out Tanks ☐
- d. Compressor or Pump Stations ☐
- e. Change in Class Location ☒
- f. Casings ☐
- g. Cathodic Protection ☒
- h. Cast-iron Replacement ☐
- i. Damage Prevention ☒

j.	Deactivation	<input type="checkbox"/>
k.	Emergency Procedures	<input checked="" type="checkbox"/>
l.	Inspection of Right-of-Way	<input type="checkbox"/>
m.	Line Markers	<input checked="" type="checkbox"/>
n.	Liaison with Public Officials	<input checked="" type="checkbox"/>
o.	Leak Surveys	<input type="checkbox"/>
p.	MOP	<input type="checkbox"/>
q.	MAOP	<input type="checkbox"/>
r.	Moving Pipe	<input type="checkbox"/>
s.	New Construction	<input type="checkbox"/>
t.	Navigable Waterway Crossings	<input type="checkbox"/>
u.	Odorization	<input checked="" type="checkbox"/>
v.	Overpressure Safety Devices	<input checked="" type="checkbox"/>
w.	Plastic Pipe Installation	<input type="checkbox"/>
x.	Public Education	<input type="checkbox"/>
y.	Purging	<input type="checkbox"/>
z.	Prevention of Accidental Ignition	<input type="checkbox"/>
A.	Repairs	<input type="checkbox"/>
B.	Signs	<input type="checkbox"/>
C.	Tapping	<input type="checkbox"/>
D.	Valve Maintenance	<input 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:

The transmission line was installed in 1929. Several sections of the transmission line are eight and ten inches in diameter. The line is coated and protected by 11 rectifiers systems located along the pipeline. During the audit a train derailment occurred ten miles south of Roswell. One of the New Mexico Gas Company representatives responded to the accident and arrived on the site to insure the transmission line was not damaged. The field inspection consisted of leak testing a current grade 3 leak that was found to have increased slightly from previous monitor checks. Operator is considering making repairs. A review of odorization stations, emergency valves, regulator stations and checking set pressure and closure, along with pipe to soil potential readings and rectifier readings was conducted. No areas of concern or violations were found or noted during the field portion of the inspection. Again, the field inspection was conducted in a professional manner.

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

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

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

Evaluator Notes:

NA

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

Evaluator Notes:

NA

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

Evaluator Notes:

NA

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

Evaluator Notes:

NA

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

Evaluator Notes:

NA

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

Evaluator Notes:

NA

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

Evaluator Notes:

NA

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

Evaluator Notes:

NA

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

Evaluator Notes:

NA

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

Evaluator Notes:

NA

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

Evaluator Notes:

NA

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

Evaluator Notes:

NA

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

Evaluator Notes:

NA

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

Evaluator Notes:

NA

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

Evaluator Notes:

NA

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