	1	2	3	4	5	6	7	8	Total	Score
API 1104 - Weld Procedures	14.29% 1	28.57% 2	0.00% 0	14.29% 1	0.00% 0	14.29% 1	0.00% 0	28.57% 2	7	4.57
Damage Prevention - new regulation 196	14.29% 1	14.29% 1	28.57% 2	28.57% 2	14.29% 1	0.00% 0	0.00% 0	0.00% 0	7	5.86
49 CFR 192 -(Gas) Notice of Proposed Rulemaking -Summary of proposed changes & implementation	50.00% 4	12.50% 1	12.50% 1	12.50% 1	0.00% 0	0.00% 0	0.00% 0	12.50% 1	8	6.38
Cross boring	12.50% 1	0.00% 0	25.00% 2	25.00% 2	25.00% 2	12.50% 1	0.00% 0	0.00% 0	8	5.13
Integrity Management - Transmission or Distribution	0.00% 0	0.00% 0	25.00% 2	0.00% 0	37.50% 3	12.50% 1	25.00% 2	0.00% 0	8	3.88
Rules as they apply to master meters	0.00% 0	14.29% 1	0.00% 0	0.00% 0	14.29% 1	14.29% 1	57.14% 4	0.00% 0	7	3.14
Anti-Drug and Alcohol policies as they apply to pipeline operators	0.00% 0	0.00% 0	0.00% 0	25.00% 2	0.00% 0	50.00% 4	25.00% 2	0.00% 0	8	3.25
49 CFR 195 (Liquids)- Notice of Proposed Rulemaking -Summary of proposed changes & implementation	12.50% 1	25.00% 2	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00% 0	62.50% 5	8	3.38

NMGA Survey Comments:

- Move tolerance zone from 18 to 24 inches
- Emergency Locates- What constitutes a valid emergency?
- Road maintenance (blading): Contractor Education regarding excavation, replacement of dirt when blading.
- Various interpretations of required records/mapping related to cathodic protection, MAOP, drug/alcohol plans, etc...

Record Keeping:

> Traceable records are those which can be clearly linked to original information about a pipeline segment or facility. Traceable records might include pipe mill records, purchase requisition, or as-built documentation indicating minimum pipe yield strength, seam type, wall thickness and diameter. Careful attention should be given to records transcribed from original documents as they may contain errors. Information from a transcribed document, in many cases, should be verified with complementary or supporting documents.

Verifiable records are those in which information is confirmed by other complementary, but separate, documentation. Verifiable records might include contract specifications for a pressure test of a line segment complemented by pressure charts or field logs. Another example might include a purchase order to a pipe mill with pipe specifications verified by a metallurgical test of a coupon pulled from the same pipe segment. In general, the only acceptable use of an affidavit would be as a complementary document, prepared and signed at the time of the test or inspection by an individual who would have reason to be familiar with the test or inspection.

Complete records are those in which the record is finalized as evidenced by a signature, date or other appropriate marking. For example, a complete pressure testing record should identify a specific segment of pipe, who conducted the test, the duration of the test, the test medium, temperatures, accurate pressure readings, and elevation information as applicable. An incomplete record might reflect that the pressure test was initiated, failed and restarted without conclusive indication of a successful test. A record that cannot be specifically linked to an individual pipe segment is not a complete record for that segment. Incomplete or partial records are not an adequate basis for establishing MAOP or MOP. If records are unknown or unknowable, a more conservative approach is indicated.

Recent Audit Findings:

- Filing an Annual Report and filling out the report correctly.
- Currently review everyone's welding procedures.
- PE pipe Storage: Operator are exceeding the requirements of ASTM D2513, 4.10 UV Resistance—PE materials shall be Code C or E as defined in Specification D3350. Code C material shall contain2 to 3 percent well dispersed carbon black, and due to the absorptive properties of the carbon black, is considered to be stabilized against deterioration from unprotected exposure to UV for not less than 10 years. Code E material shall be stabilized and protected against deterioration from unprotected UV exposure for not less than 3 years.
- D&A Issues i.e., reporting time to collection site.
- O&M procedure written mirroring the regulation.
- There are still questions regarding 192.201. Operators are not properly demonstrating that regulators at stations are in good mechanical condition. Lock-up test during inspections have found operational problems with regulators, and some regulators are not properly set. Regulator Stations Inspections Lock up/Set point as related to MAOP.
- Per 192.605.b.8: Periodically reviewing the work done by operator personnel to determine the effectiveness and adequacy of the procedures used in normal operation and maintenance and modifying the procedure when deficiencies are found. Supervisors not reviewing work conducted by employees to ensure tasks are conducted per procedure and proper record keeping by the supervisor for this activity.
- Incomplete forms including signatures.

- Records not identifying clearance with other utilities or depth of cover during new construction or replacement.

- Several inspection units are not checking for atmospheric corrosion under pipe supports.

- Plans (i.e., O&M, PA, IMP, OQ, D&A, etc) failed to include version, revision date, and effective date.

WELDING:

- Welding qualifying tests and procedures do not meet the 20th edition of API 1104.

- Operators have conducted welding by a process that was not pre qualified. In some cases welders have produced welds and did not weld to the qualified procedure.

MASTER METERS:

- Master meter operators, for the most part, have not developed their plans, much less identified threats, rank or implemented measures to mitigate those risks. It appears operators/owners are waiting for PSB to perform the first inspections. Possibly confused and afraid to make an attempt at developing a plan. Operators are looking for a turnkey plan, which contractors believe to be very time-consuming and shy away. It's also the lack of records, AS-Builds and knowledge of what's really underground. MM change managers and ownership frequently and information gets lost or destroyed.

- It's going to be costly for operators to have a plan developed for them = bottle neck

- Although historically MM operators don't attend. There is a serious problem with owners/operators not training new managers.

- Operators not providing PSB list of master meter operators. Addendum Question.

DIMP:

- Risk ranking did not include all risks to all facilities.

- Program lacking system description, operating pressures, MAOP, construction dates, etc.

- Improper risk ranking

- Written procedures for validation of risk ranking.

- Written procedures for measures beyond min code requirements for reducing risks.

- Written procedures for measuring performance, monitoring results, and evaluates effectiveness.

- Municipalities were sold programs from 3rd party contractors and were given no support for implementation.

- Operators have a basic knowledge of their system; it's in identifying threats and then ranking them is where they struggle.