

# PIPELINE SAFETY CONSULTING AND TRAINING

ORTIZ PIPELINE SERVICES LLC.  
PO BOX 7224  
CORPUS CHRISTI, TEXAS 78467  
ORTIZPIPELINESERVICES.COM

MITCHELL ORTIZ, MANAGING MEMBER  
361-903-8113  
MITCH@ORTIZPIPELINESERVICES.COM



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## ON SITE SURVEY REPORT OF THE CITY OF BOERNE

Operator P-5 Organization Number: 154628

DEPARTMENT OF TRANSPORTATION (DOT) OPERATOR ID NUMBER: 01592

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## FOR THE TEXAS MUNICIPAL LEAGUE INTERGOVERNMENTAL RISK POOL

SURVEY CONDUCTED ON: Thursday, February 5, 2026  
447 N. MAIN ST., BOERNE, TX 78006  
KENDALL

Submitted by:

Mitchell Ortiz, Managing Member

<b>DEMOGRAPHIC INFORMATION.....</b>	<b>1</b>
<b>SYSTEM INFORMATION.....</b>	<b>2</b>
<b>SURVEY QUESTIONNAIRE .....</b>	<b>3</b>
<b>PREFACE TO SURVEY REPORT .....</b>	<b>7</b>
<b>REPORT ON PIPELINE SAFETY INSPECTION.....</b>	<b>7</b>
<b>REGULATORY REPORTING PERFORMANCE AND RECORDS (FEDERAL) .....</b>	<b>11</b>
<b>REGULATORY REPORTING PERFORMANCE AND RECORDS (STATE) .....</b>	<b>11</b>
<b>GENERAL, MATERIALS, AND PIPE DESIGN.....</b>	<b>11</b>
<b>CONSTRUCTION PERFORMANCE AND RECORDS .....</b>	<b>12</b>
<b>OPERATIONS AND MAINTENANCE PERFORMANCE AND RECORDS .....</b>	<b>13</b>
<b>CORROSION CONTROL PERFORMANCE AND RECORDS .....</b>	<b>15</b>
<b>PIPELINE FIELD INSPECTION.....</b>	<b>16</b>
<b>QUALIFICATION OF PIPELINE PERSONNEL PROCEDURES (SUBPART N) .....</b>	<b>17</b>
<b>GAS DISTRIBUTION PIPELINE INTEGRITY MANAGEMENT (SUBPART P) .....</b>	<b>17</b>
<b>PROTECTION OF UNDERGROUND PIPELINES FROM EXCAVATION ACTIVITY (PART 196) .....</b>	<b>18</b>
<b>DRUG AND ALCOHOL TESTING REGULATIONS AND PROCEDURES (PART 199).....</b>	<b>18</b>
<b>PERFORMANCE RATING .....</b>	<b>19</b>

## DEMOGRAPHIC INFORMATION

Information provided by operator representative(s)

Name of Municipality	City of Boerne	
Business (Physical) Address	447 N. Main St.	
City, State, Zip	Boerne, TX, 78006	
Mailing Address	P.O. Box 1677	
County	Kendall	
Date of inspection	2/5/2026	
Survey Representative	Mitchell Ortiz, Ortiz Pipeline Services LLC.	
Name(s) and Title(s)	Crystal Barrera	Michael Sharp
City representative(s)	Regulatory SVCS Admin	Gas Construction Supt.
Office Address	447 N. Main St.	447 N. Main St.
Telephone Number	830-331-9708	830-248-1538
Fax Number	830-331-9708	830-331-9708
Email	cbarrera@boerne-tx.gov	msharp@boerne-tx.gov
24- hour emergency number	830-248-1633	
Area(s) Served	Boerne	
Population	27038	
Mayor	Frank Ritchie	
City Manager	Benjamin Thatcher	
Assistant City Manager	Kristy Stark/Danny Zincke	
City Secretary	Lori Carroll	
Operation Administrator	Terry Nolan	
Gas Superintendent	Michael Sharp	
Administrative Assistant	Jessica Nelson	
Number of gas utility personnel	65	

OPERATOR ON SITE SURVEY REPORT

**SYSTEM INFORMATION**

Information provided by operator representative(s)

Gas purchased from	Enterprise/Grey Forest Utilities		
Gas odorized by	City of Boerne/Grey Forest Utilities		
Date gas system originally installed	Unknown		
Total number of Meters in Service	4738		
Residential	3920	Commercial	815
		Industrial	
Farm taps		Master Meters	3
		Other	
Number of Supply Points to the city	2		
Gas Suppliers	Enterprise/Grey Forest Utilities		
Number of City-Owned Wells			
Number of Key Valves in the System	38		
Pipe Material Type	Distribution	Transmission	
Bare Steel			
Coated Steel	25.51		
Polyethylene	68.02		
Total Miles of Pipe in System	93.53		
Distributions Maximum Allowable Operating Pressure (MAOP)	50		
Frequency of Business System Patrols	Quarterly		
Date of Last Business Area Leak Survey	5/16/2025		
	Classification	Found	Repaired
Number of Leaks by Grade	Grade I	0	0
	Grade II	2	2
	Grade III	0	0
Date of Last Non-Business Area Leak Survey	5/20/2025		
Number of Leaks by Grade	Grade I	0	0
	Grade II	0	0
	Grade III	0	0
Unaccounted for Gas reported by the city representative for the past three years	2025	0.85% Gain	
	2024	4.0% Gain	
	2023	4.67% Gain	

## SURVEY QUESTIONNAIRE

Information provided by operator representative(s)

Question	Yes	No
1. Have there been any natural gas fires or explosions during the past year?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. Have there been any reportable incidents concerning natural gas during the past year?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2a. If yes to 1 and/or 2 above, please explain.		
3. Has the municipality adopted a municipal building code?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3a. If yes, which building code has been adopted?	IBC 2021	
4. Have there been any system upgrades over the past year?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4a. If yes, please explain:	Steel and poly pipeline replacements.	
5. Is a regular meter replacement program in place?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6. Has an annual maintenance schedule been developed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7. Are maintenance tasks conducted in accordance with the annual maintenance schedule?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8. Are any outside consultants/contractors used to work on the gas system?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8a. If yes, list individuals and/or company names:	Steve Schroeder/Chapman Engineering	
9. Have consultants/contractors been operator qualified on this gas system, or do they work under the direct observation of a qualified individual?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10. Has the operator verified the drug and alcohol plans of any qualified contractors who work on this gas system?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
11. Has the O & M Manual been reviewed at least once each calendar year but no more than 15 months apart?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
12. Is the O & M Manual current?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
12a. Date of Last Review:	10/24/2025	

OPERATOR ON SITE SURVEY REPORT

Question	Yes	No
13. Are all currently used task procedures covered in the O & M Manual?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
14. Is the operator's drug and alcohol plan current?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
15. Who implements operator's drug and alcohol testing program? City of Boerne		
16. Are safety meetings held on a regularly scheduled basis and documented?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
16a. If yes, how often are documented meetings held? Weekly		
17. Has the operator conducted a documented annual training and review of the procedures necessary to implement the emergency plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
18. Has the Railroad Commission completed a Standard Comprehensive Inspection of this facility within the past twelve months?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
19. Type of Last Inspection: Operator Qualification	19a. Date of Last Inspection:	1/30/2026
20. Has an operator qualification program been implemented?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
21. Has the operator qualification program been reviewed and/or updated and documented as necessary?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
22. Has the operator qualified or re-qualified, (as necessary) all individuals performing covered tasks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
23. Does documentation of the continuing surveillance program include adequate verification of leak repairs and remedial measures to address lost and unaccounted for gas (LAUFG)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
24. Has the operator implemented a Distribution Integrity Management Plan (DIMP) pursuant to PHMSA Form-22/24?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
25. Has the operator filed an annual report to the Texas Railroad Commission for the Texas DIMP (16 TAC 8.209(i))?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
26. Has the operator identified and prioritized any potential DIMP risk(s) to the system?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

OPERATOR ON SITE SURVEY REPORT

Question	Yes	No
27. Is the DIMP program proactive to provide for replacement of older piping and upgrading of aging infrastructure?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
28. Does the operator installing excess flow valves on new or replaced service lines operated at or above 10 psig that provide up to 1,000 standard cubic feet of gas per hour?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
29. Does the operator install curb valves on services that provide over 1,000 standard cubic feet of gas per hour?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
30. Does the operator provide notice to customers about available retrofitting of existing services with an excess flow valve?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
31. Is the utility a member of a one-call program?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
32. Does the operator mark pipelines in the vicinity of excavation when requested by the one-call system?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
33. Are the markings (line locates) documented?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
34. Are line locate records retained for at least 4 years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
35. Does the operator have a program to meet the requirements of the Texas Damage Prevention program?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
36. Does the operator notify all new customers (within 90 days), and provide an annual notice to all customers of their responsibility to maintain and repair service lines not owned or maintained by the operator?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
37. Has a documented liaison been conducted with public officials during the past year?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
37a. Date of last documented meeting: 9/21/2025		
38. Does the operator have a trenching procedure for excavation and the necessary equipment for rescue?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
39. Has the operator implemented a Bi-Lingual Public Awareness Program in accordance with the requirements of API RP 1162 and §192.616, with bilingual gas information twice annually?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
40. Has the operator enhanced the Public Awareness Program within the past 4 years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

OPERATOR ON SITE SURVEY REPORT

Question	Yes	No
41. Has the operator evaluated the effectiveness of the Public Awareness Program through stakeholder surveys?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
42. Who implements the operator's Public Awareness Program? City of Boerne		
43. Is the operator aware that PHMSA has rescinded Section 114?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
44. Has the operator filed in 2025		
44a. The Form PS-95 Semi-Annual Leak Report (Jan. & July)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
44b. The PMSA F7100.1-1 by March 15 <sup>th</sup> , 2025?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
44c. The Form P-5 Organization Report?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
45. Does operator's gas system contain compression couplings?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
45a. If yes, are they positive restraint couplings?	Yes	

## **PREFACE TO SURVEY REPORT**

On February 5, 2026, I visited the City of Boerne in Kendall County with a population of about 27,038 citizens. I met with Ms. Crystal Barrera, the Regulatory Services Administrator, and Mr. Michael Sharp, Gas Construction Superintendent, to review information provided in a Survey/Questionnaire previously sent to be completed in preparation for a safety analysis of the gas system, documents, and operations. During my visit, documents and policies were readily available for review to compile this report. Documents available for review consisted of their most recent filing of their EIA-176 gas sales/purchases, operation procedures, maintenance records, gas leak records, and leak survey documentation. Additionally, I performed a general review of their gas utility safety practices including inspections of the city gas system in random areas. The combination of the documents reviewed, the interview with the representatives, and my personal observations aided in the completion of this report.

## **REPORT ON PIPELINE SAFETY INSPECTION**

Based on my observations and reviews, here is my assessment of the Gas Utility. The Operator operates a medium size gas system that is made up of 93.53 miles of polyethylene pipe and coated steel pipe. There are an estimated 4,738 customers connected to the distribution system. The operator is expected to buy more natural gas for the year compared to smaller gas systems.

During field inspections of the gas distribution system, the above ground facilities indicated that the maintenance program is adequate. Regulation 49 CFR §192.481, regarding atmospheric corrosion control, dictates that the operator is to monitor above ground piping for evidence of atmospheric corrosion, and should be conducted at least once every three years, not to exceed thirty-nine months and for services lines, at least once every 5 calendar years, but within intervals not exceeding 63 months, however, if atmospheric corrosion is found on a service line during the most recent inspection, then the next inspection of the pipeline or portion of pipeline must be within 3 calendar years, but with intervals not exceeding 39 months. During my consultation, the representative asserted that they perform atmospheric corrosion inspections as specified above, demonstrating adherence to regulatory requirements.

PHMSA has rescinded Advisory Bulletin (ADB)-2021-01 as of June 2025 – and any PHMSA policy statements, letters of interpretation, guidance documents, congressional testimony, and public statements that rely on or assert the reading of the section 114 mandate expressed in ADB-2021-01. Owners and operators of pipeline facilities should adhere to the text of section 114 of the 2020 PIPES Act and section 60108(a) of the Pipeline Safety Act in developing and implementing their inspection and maintenance plans. PHMSA and State authorities will do the same in considering the factors in section 60108(a)(2) and in exercising their inherent enforcement discretion to decide whether an operator's inspection and maintenance plan is adequate. Owner and operators should remember that they are required to comply with their OM&E as it is written even if the manual exceeds the requirements of the rule or law. Therefore, it is recommended that owners and operators revise their written procedures, if they

## OPERATOR ON SITE SURVEY REPORT

have not done so yet, to eliminate statements which are no longer required to get the full benefit of ADB-2021-01 rescission.

The Operator states that documented safety meetings are held weekly. Industry's best practices suggest that natural gas Utility Operators conduct and document safety meetings at least once every 3 months to improve their readiness and preparedness of AOC's or other situations that might arise. In addition to that, according to §192.615(c) the emergency plan should be trained on and include documented reviews of the procedures necessary to implement the emergency plan. A plan for periodic review of the procedures in the Emergency Plan must be made to ensure personnel work is effective and adequate for those outlined procedures. Equally, the Operator must have procedures to modify those outlined procedures when deficiencies are found. 16 TAC §8.235: The operator's representative shall communicate and conduct liaison activities at intervals not exceeding 15 months, but at least once each calendar year. As of the date of this survey, the operator's most recent recorded liaison meeting occurred on September 21, 2025, demonstrating adherence to regulatory requirements.

Scheduling liaison meetings earlier in the year is recommended, as it provides additional time to finish related tasks within intervals not exceeding 15 months. This strategy also helps address possible scheduling conflicts with other important meetings attended by key personnel.

The frequency of patrolling mains must be determined by the severity of the conditions which could cause failure or leakage, and the consequent hazards to public safety. Operators must include in the plan provisions for patrolling mains located in places or on structures where anticipated physical movement or external loading (e.g., weight and traffic) could cause failure or leakage. These places include bridges, waterways, landslide areas, areas susceptible to earth subsidence (cave ins), or areas of construction activity. According to the prequestionnaire, the Operator conducts business district patrols on a quarterly basis and non-business district patrols semi-annually, demonstrating adherence to regulatory requirements.

The Operator reported that a leakage survey of the entire gas system was completed on May 20, 2025. According to the operator, 2 Grade Two Leaks were found and repaired. Each operator must ensure that leak grading is done only by those individuals who possess training, experience, and knowledge in the field of leak classification and investigation, including extensive association with actual leakage work. The judgment of these individuals, based upon all pertinent information and a complete leakage investigation at the scene, must form the basis for the leak grade determination. The purpose of the leak grading system is to determine the degree or extent of the potential hazard resulting from gas leakage and to prescribe remedial actions. Each operator must promptly respond to any notification of a gas leak or gas odor or any notification of damage to facilities by excavators or other outside sources. In addition, each operator must ensure that its leak detection equipment is properly calibrated. The operator is adhering to regulatory requirements.

## OPERATOR ON SITE SURVEY REPORT

Lost And Unaccounted For (LAUF) Gas is the difference between the volume of natural gas supply and the volume of natural gas consumption. Natural gas is bought and sold by volume, but since natural gas is highly compressible, the pressure and the temperature at which the volume is recorded has a strong effect on the measured volume. To ensure equitable payments for natural gas, the industry has adopted standard conditions for measurement of volume: 60 degrees Fahrenheit and 14.73(Atm) pounds per square inch absolute (PSIA).

The reported unaccounted-for gas for 2025 was a gain of 0.85%. The data for unaccounted for gas was provided by the operator. It is recommended that the operator review the equation for calculating % of LAUF gas **highlighted** below.

The equation for calculating % of LAUF gas:

$$\% \text{ LAUF Gas} = \frac{(\text{Purchased gas} + \text{produced gas}) - (\text{Customer use} + \text{city use} + \text{appropriate adjustments})}{(\text{Purchased gas} + \text{produced gas})} \times 100$$

The BTU content of the purchased natural gas was not provided by the Operator, however, the operator indicated that the quality of gas they are receiving from their supplier is dry with no signs of impurities.

The O&M Manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. The manual is required to include procedures for maintenance and normal operations for operating a pipeline in accordance with 49 CFR Subpart L & Subpart M. The manual must include instructions enabling personnel who perform operation and maintenance activities to recognize conditions that potentially may be safety-related conditions that are subject to the reporting requirements of 49 CFR §191.23. There shall also be procedures included in the manual for surveillance, emergency response, and accident investigation. As of the date of this survey, the operator's most recent O&M review occurred on October 24, 2025, demonstrating adherence to regulatory requirements.

The most recent comprehensive Railroad Commission inspection (in public records) was conducted between March 17, 2025, through March 21, 2025. The Utility Operator was cited for one (1) alleged violation, which has been addressed. The Operator has also undergone the following specialized inspections in the past.

1. Operator Qualification: January 30, 2026, 0 alleged violations.
2. Distribution Integrity Management Program (DIMP): January 14, 2026, 0 alleged violations.
3. Drug and Alcohol: January 7, 2026, 0 alleged violations.
4. Operations and Maintenance Procedures: October 30, 2025, 0 alleged violations.

It is recommended that the operator review the areas noted above and below for suggestions and recommendations to continue to strive for excellence. It should be noted that Texas Railroad Commission inspectors have been encouraged to use the federal forms and protocols

## OPERATOR ON SITE SURVEY REPORT

for the inspections (audits) of pipeline operators. In addition to the standard pipeline safety audits, Texas Railroad Commission inspectors are conducting random audits specifically targeting O & M Manuals, Operator Qualification Programs, Damage Prevention Programs, Public Awareness Programs, Distribution Integrity Management Programs (DIMP), and Drug and Alcohol Testing Regulations and Procedures. Operators should carefully review these programs for regulatory compliance and perform updates as necessary. If the operator needs any assistance preparing for Texas Railroad Commission inspections or any reference documents, including copies of federal and state forms, pipeline safety regulations, industry interpretations of pipeline safety regulations, sample (generic) forms, maintenance records, etc., please contact our office.

**REGULATORY REPORTING PERFORMANCE AND RECORDS  
(FEDERAL)**

- §191.5                      Telephonic Reports to National Response Center (NRC)*
- §191.15                    Written Incident Reports; Supplemental Incident Reports (Form F 7100.2)*
- §191.11                    Annual Reports (Forms 7100.1-1, 7100.2-1)*
- §191.23                    Safety Related Condition Reports*

*Comments/Recommendation:*

Meets survey criteria for the related regulations above.

**REGULATORY REPORTING PERFORMANCE AND RECORDS  
(STATE)**

- §8.51                        Organization Report (Form P-5)*
- §8.105                      Records*
- §8.115                      New Construction Commencement Report (Form PS-48)*
- §8.207                      Leak grading and repair*
- §8.208                      Mandatory Removal and Replacement Program*
- §8.209                      Distribution Facilities Replacements (DIMP)*
- §8.209(d)                  Risk analysis using data collected under its DIMP and the data submitted on the PS-95.*
- §8.210                      Reports*
- §8.230                      School Pipe Testing*

*Comments/Recommendation:*

Meets survey criteria for the related regulations above.

**GENERAL, MATERIALS, AND PIPE DESIGN**

- §192.5                      Class locations*

OPERATOR ON SITE SURVEY REPORT

<i>§192.16</i>	<i>Customer notification</i>
<i>§192.55</i>	<i>Steel pipe</i>
<i>§192.59</i>	<i>Plastic pipe</i>
<i>§192.69</i>	<i>Storage and handling of plastic pipe and associated components</i>
<i>§192.204</i>	<i>Risers installed after January 22, 2019</i>

*Comments/Recommendation:*

Meets survey criteria for the related regulations above.

**CONSTRUCTION PERFORMANCE AND RECORDS**

<i>§192.225</i>	<i>Test Results to Qualify Welding Procedures</i>
<i>§192.227</i>	<i>Welder Qualification</i>
<i>§192.241(a)</i>	<i>Visual Weld Inspector Trainer/Experience</i>
<i>§192.243(b)(2)</i>	<i>Nondestructive Technician Qualification</i>
<i>§§192.273/.283</i>	<i>Qualified Joining Procedures Including Test Results</i>
<i>§192.285</i>	<i>Personnel Joining Qualifications</i>
<i>§192.287</i>	<i>Joining Inspection Qualifications</i>
<i>§192.303</i>	<i>Construction Specifications</i>
<i>§192.325</i>	<i>Underground Clearance</i>
<i>§192.327</i>	<i>Amount, Location, Cover of Each Size of Pipe Installed</i>
<i>§§192.381/.383</i>	<i>EFV Customer Installation and Performance</i>
<i>§192.385</i>	<i>Manual Service Line Shut-Off Valve Installation</i>
<i>§192.455</i>	<i>Cathodic Protection</i>
<i>§192.627</i>	<i>Tapping Pipelines Under Pressure</i>
<i>§192.629</i>	<i>Purging of Pipelines</i>
<i>§192.225</i>	<i>Test Results to Qualify Welding Procedures</i>

OPERATOR ON SITE SURVEY REPORT

- §192.227 *Welder Qualification*
- §192.285 *Personnel Joining Qualifications*

*Comments/Recommendation:*

Meets survey criteria for the related regulations above.

**OPERATIONS AND MAINTENANCE PERFORMANCE AND RECORDS**

- §192.517(a) *Pressure Testing (Operates at or Above 100 psig) - Useful Life of Pipe*
- §192.517(b) *Pressure Testing (Operates Below 100 psig, Service Lines, Plastic Lines) - 10 Years*
- §192.605(a) *Procedural Manual Review (O & M Manual) - 1 per year/15 months*  
192.605(b)(3) *Availability of Construction Records, Maps, Operating History to Operating Personnel*
- §192.605(b)(8) *Periodic Review of Personnel Work - Effectiveness of Normal O & M Procedures*
- §192.605(c)(4) *Periodic Review of Personnel Work - Effectiveness of Abnormal Operations Procedures*
- §192.609 *Class Location Study (if applicable)*
- §192.613 *Continuing Surveillance*
- §192.614 *Damage Prevention – One Call; Compliance with 16 TAC 18.1-18.12 (Texas Damage Prevention)*
- §192.615(b)(1) *Location Specific Emergency Plan*
- §192.615(b)(2) *Emergency Procedure Training, Verify Effectiveness of Training*
- §192.615(b)(3) *Employee Emergency Activity Review, determine if Procedures were Followed*
- §192.615(c) *Liaison Program with Public Officials*
- §192.616 *Public Awareness Program*
- § 192.616(e)(f) *Documentation Properly and Adequately Reflects Implementation of the Operator's Public Awareness Program Requirements - Stakeholder Audience Identification, Message Type and Content,*

OPERATOR ON SITE SURVEY REPORT

*Delivery Method and Frequency, Supplemental Enhancements, Program Evaluations, etc.*

- §192.616(g) *The Public Awareness Program (Must be Conducted in English and Any Other Languages Commonly Understood by a Significant Number of the Population in the Operator's Area)*
- §192.616(h) *Effectiveness Review of Operator's Public Awareness Program; LDC Frequency*
- §192.617 *Failure Investigation Reports (Also Include Third Party Damage and Leak Response Records)*
- §192.517 *Pressure Testing*
- §§192.619–.623 *Maximum Allowable Operating Pressure (MAOP)*
- §192.625 *Odorization of Gas – Readily Detectable at 20% LEL and Uniform Odorant All Year*
- §192.705 *Patrolling*
- §192.721(b)(1) *Patrolling Business District (4 per year/4½ months)*
- §192.721(b)(2) *Patrolling Outside Business District (2 per year/7½ months)*
- §192.723 *Leakage Survey (Federal) - Outside Business District (5 years),  
Cathodically Unprotected Distribution Lines (3 years),  
Leakage Survey (State) - Business District (1 per year),  
Outside Business District (Polyethylene 5 years),  
Cathodically Protected Steel (3 years),  
Cathodically Unprotected Steel and All others (2 years)*
- §192.725 *Tests for Reinstating Service Lines*
- §192.727 *Abandoned Pipelines*
- §192.739 *Pressure Limiting and Regulating Stations (1 per year/15 months)*
- §192.743 *Pressure Limiting and Regulating Stations - Capacity (1 per year/15 months)*
- §192.745 *Valve Maintenance Transmission Lines (1 per year/15 months)*
- §192.747 *Valve Maintenance Distribution Lines (1 per year/15 months)*
- §192.749 *Vault Maintenance (1 per year/15 months)*

## OPERATOR ON SITE SURVEY REPORT

<i>§192.751</i>	<i>Prevention of Accidental Ignition (Hot Work Permits)</i>
<i>§192.755</i>	<i>Caulked Bell and Spigot Joint Repair</i>
<i>§192.225(b)</i>	<i>Welding - Procedure</i>
<i>§192.227/.229</i>	<i>Welding - Welder Qualification</i>
<i>§192.243(b)(2)</i>	<i>Non-Destructive Testing (NDT) - NDT Personnel Qualification</i>
<i>§192.283</i>	<i>Joining - Procedures</i>
<i>§192.285</i>	<i>Joining - Personnel Qualifications</i>
<i>§192.287</i>	<i>Joining - Inspector Qualifications</i>

### *Comments/Recommendation:*

Meets survey criteria for the related regulations above.

Recommendation: The Operator should ensure the effectiveness of its Emergency Plan with annual documented training. Moreover, the Operator should perform a documented mock drill. It is recommended that a mock drill be performed at a minimum, once every 5 years.

## **CORROSION CONTROL PERFORMANCE AND RECORDS**

<i>§192.491(a)</i>	<i>Maps or Records</i>
<i>§192.459</i>	<i>Examination of Buried Pipe When Exposed</i>
<i>§192.461</i>	<i>External Corrosion Control: Protective Coating</i>
<i>§192.465(a)</i>	<i>Annual Pipe-to-Soil Monitoring (1 per year/15 months) for Short Sections (10% per year; all in 10 years)</i>
<i>§192.465(b)</i>	<i>Rectifier Monitoring (6 per year/2 months)</i>
<i>§192.465(c)</i>	<i>Interference Bond Monitoring - Critical (6 per year/2 months)</i> <i>Interference Bond Monitoring - Non-Critical (1 per year/15 months)</i>
<i>§192.465(d)</i>	<i>Prompt Remedial Actions</i>
<i>§192.465(e)</i>	<i>Unprotected Pipeline Surveys, CP Active Corrosion Areas (1 per 3 calendar years/39 months)</i>
<i>§192.467</i>	<i>Electrical Isolation (Including Casings)</i>

OPERATOR ON SITE SURVEY REPORT

§192.469	<i>Test Stations - Sufficient Number</i>
§192.471	<i>Test Lead Maintenance</i>
§192.473	<i>Interference Currents</i>
§192.475(a)	<i>Internal Corrosion; Corrosive Gas Investigation</i>
§192.475(b)	<i>Internal Corrosion; Internal Surface Inspection; Pipe Replacement</i>
§192.476(d)	<i>Internal Corrosion; New System Design; Evaluation of Impact of Configuration Changes to Existing Systems</i>
§192.477	<i>Internal Corrosion Control Coupon Monitoring (2 per year/7½ months)</i>
§192.481	<i>Atmospheric Corrosion Control Monitoring (1 per 3 calendar years/39 months onshore; 1 per year/15 months offshore)</i>
§§192.483/.485	<i>Remedial: Replaced or Repaired Pipe; Coated and Protected; Corrosion Evaluation and Actions</i>

*Comments/Recommendation:*

Meets survey criteria for the related regulations above.

**PIPELINE FIELD INSPECTION**

§192.179	<i>Valve Protection from Tampering or Damage</i>
§192.463	<i>Cathodic Protection</i>
§192.465	<i>Rectifiers</i>
§192.476	<i>Systems Designed to Reduce Internal Corrosion</i>
§192.479	<i>Pipeline Components Exposed to the Atmosphere</i>
§192.605	<i>Knowledge of Operating Personnel</i>
§192.707	<i>Right-of-Way Markers, Road, and Railroad Crossings</i>
§192.719	<i>Pre-pressure Tested Pipe (Markings and Inventory)</i>
§192.741	<i>Telemetry, Recording Gauges</i>
§§192.739/.743	<i>Pressure Limiting and Regulating Devices</i>

OPERATOR ON SITE SURVEY REPORT

§192.745                      *Valve Maintenance*

§192.751                      *Warning Signs*

*Comments/Recommendation:*

Meets survey criteria for the related regulations above.

Recommendation: The Operator should ensure that individuals performing covered tasks on field inspections are qualified and evaluated according to Subpart N, CFR 49, Part 192, and their OQ Program.

**QUALIFICATION OF PIPELINE PERSONNEL PROCEDURES  
(SUBPART N)**

§§192.801-.809              *Operator Qualification*

*Comments/Recommendation:*

Meets survey criteria for the related regulations above.

**GAS DISTRIBUTION PIPELINE INTEGRITY MANAGEMENT  
(SUBPART P)**

§192.1005                      *Written Plan Proposed and Implemented by August 2, 2011*

§192.1007                      *Written Plan Identifies Adequate Sources For: Design/Construction; Operating Conditions/Procedures; Operating Environmental Factors; Knowledge of System; One Call/Excavation Damage; O & M Procedures; Field Surveys; Historical Data*

§192.1007(b)                 *Identification of Threats: Corrosion; Natural Forces; Excavation Damage; Other Outside Force Damage; Materials, Welds or Joints; Equipment Failure; Incorrect Operations; Other Concerns*

§192.1007(c)                 *Evaluation and Ranking of Risk*

§192.1007(d)                 *Evaluation of Measures Beyond Minimum Code Compliance*

§192.1007(e)                 *Measure, Monitor and Evaluate*

§192.1007(f)                 *Periodic Review*

§192.1007(g)                 *Reporting*

OPERATOR ON SITE SURVEY REPORT

*§192.1009 Mechanical Fittings*

*§192.1011 Records Retained for 10 Years*

*Comments/Recommendation:*

Meets survey criteria for the related regulations above.

**PROTECTION OF UNDERGROUND PIPELINES FROM EXCAVATION  
ACTIVITY (PART 196)**

*SUBPARTS A – C Damage Prevention Requirements and Administrative Enforcement  
Process*

*Comments/Recommendation:*

Meets survey criteria for the related regulations above.

Recommendation: Title 49 CFR Part 196 references protection of underground pipelines from excavation activity. A review by the operator is recommended.

**DRUG AND ALCOHOL TESTING REGULATIONS AND PROCEDURES  
(PART 199)**

*SUBPARTS A – C Drug and Alcohol Testing and Alcohol Misuse Prevention Program*

*Comments/Recommendation:*

Meets survey criteria for the related regulations above.

**PERFORMANCE RATING**

The rating system used by the Survey Representative is based on a percentage scale, with 100% representing the highest level of prudent and safe operation practices.

95 – 100% = EXCELLENT

90 – 94% = VERY GOOD

85 – 89% = GOOD

80 – 84% = ABOVE AVERAGE

75 – 79% = AVERAGE

70 – 74% = BELOW AVERAGE

65 – 69% = POOR

60 – 64% = VERY POOR

BELOW 60% = DOES NOT MEET SURVEY CRITERIA

PERCENTAGES OF TOTAL SCORE

DOCUMENTS AND RECORDS	15%	OF	15%
PIPELINE SAFETY COMPLIANCE	20%	OF	20%
UNACCOUNTED FOR GAS	20%	OF	20%
SAFETY AND TRAINING	15%	OF	15%
QUALIFICATION OF PERSONNEL	15%	OF	15%
GAS SYSTEM CONDITION AND INTEGRITY	15%	OF	15%

PERFORMANCE RATINGS OF LAST FIVE FISCAL YEARS

<b>2025-26 PERFORMANCE RATING:</b>	<b>100%</b>
2024-25 PERFORMANCE RATING:	99%
2023-24 PERFORMANCE RATING:	99%
2022-23 PERFORMANCE RATING:	100%
2021-22 PERFORMANCE RATING:	No Data