GW - 254

WORK PLANS

2002

Public Service Company of New Mexico Alvarado Square MS 2104 Albuquerque, NM 87158 Fax 241-2376



FEDERAL EXPRESS

April 29, 2002

Mr. Jack Ford New Mexico Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505

RE: Spill Prevention Control and Countermeasure Plan Animas Compressor Station (GW-254)

Dear Mr. Ford:

Public Service Company of New Mexico (PNM) hereby submits its Spill Prevention Control and Countermeasure Plan (SPCC) for its Animas Compressor Station in accordance with the New Mexico Oil Conservation Division (NM-OCD) requirements.

Cordially,

Wilford B. Nez Sr. Engineering Tech

Wbn Enclosure

Cc: Dan Engert – PNM Compressor Mgr.

File

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

FOR

Animas Compressor Station

Township 29 North, Range 13 West, Section 15 San Juan County, New Mexico

Public Service Company of New Mexico

Original Date of Plan: April 26, 2002

Date of Last Plan Amendment / P.E. Certification:

Date of Last Plan Review:

Designated Person Accountable for Spill Prevention:

Dan Engert, Compressor Plant Manager



CERTIFICATION

I hereby certify that to the best of my knowledge, the attached Spill Prevention Control and Countermeasures Plan of the Animas Compressor Station for the Public Service Company of New Mexico, has been prepared in accordance with good engineering practices with regard to the applicable sections of title 40, CFR, Chapter 1, Part 112 of the Environmental Protection Agency rules and regulations on Oil Pollution Prevention.

Engineer:	Tohn Hak	· · · · · · · · · · · · · · · · · · ·
Signature:	Golin Hale	
Registration Number:	14923	
State:	NM	
Date:	4/25/02	

SPILL PREVENTION CONTROL AND COUNTERMEASURE COMPLIANCE INSPECTION PLAN REVIEW PAGE

In accordance with 40 CFR 112.5(b), a review and evaluation of this SPCC Plan is conducted at least once every three years. As a result of this review and evaluation, Public Service Company of New Mexico will amend the SPCC Plan within six months of the review to include more effective prevention and control technology if: (1) such technology will significantly reduce the likelihood of a spill event from the facility, and (2) if such technology has been field-proven at the time of review. Any amendment to the SPCC Plan shall be certified by a Professional Engineer within six months after a change in the facility design, construction, operation, or maintenance occurs which materially affects the facility's potential for the discharge of oil into or upon the navigable waters of the United States or adjoining shorelines.

Review Dates	<u>Signature</u>	
1		_
2		_
3		_
3		
* SPCC Plan amended and cer 112.3(d).	tified by a Registered Professional Engineer per 40 CFR	

MANAGEMENT APPROVAL

Public Service Company of New Mexico is committed to the prevention of discharges of oil to navigable waters and the environment, and maintains the highest standards for spill prevention control and countermeasures through regular review, updating, and implementation of this Spill Prevention Control and Countermeasure Plan for the Animas Compressor Station.

Authorized Facility Representative:	DANIEL	J. ENGER	r
Signature:		TO	
Title:	m AND C-SA	COMPLESSOR	15 PT

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Spill Response Procedures

PNM facility personnel should review these procedures on a regular basis. In the event of a spill, facility personnel should immediately follow the guidelines set forth in this section.

According to the OSHA Hazardous Communication Program, employers are required to provide Material Safety Data Sheets (MSDS) to employees for chemicals used and stored at facilities. PNM personnel should review the MSDS for the various oils used and stored at the station to familiarize themselves with the chemical properties of the oils, MSDS are an important part of spill response/ they provide health and reactivity data on substances. Therefore, it is necessary that facility personnel review the MSDS prior to a spill event to ensure their health and safety while responding to a spill event. MSDS for on-site substances should be kept in a location accessible to all facility and emergency response personnel.

First, stop the source of the spill (if it is safe) or take measures to get it stopped.

Second, identify spill material and PCB content from records, labels, manufacturer or use of PCB test kit.

For spills of 25 gallons or less of non-PCB containing petroleum products (if spill occurs in a waterway, contact PNM ESD)

- Use personal protective equipment (PPE) and avoid direct contact.
- Stop spill flow with absorbent materials, earthen berms, or by creating a depression ahead of the spill.
- Recover free product.
- Excavate contaminated soil with shovel.
- Store in labeled drums or lined and covered storage area.
- Call PNM ESD Spill Response Contact for guidance on disposal.

For spills of more than 25 gallons of non-PCB containing petroleum products

- Notify supervisor and a PNM ESD Spill Response Contact.
- ESD must be able to provide regulatory notification within 24 hours of spill discovery.
- Follow the same above recommended procedures for spills of 25 gallons or less.

For spills of PCB-contaminated oil, hazardous, or unknown materials

- Call 911 if public health and safety are threatened, isolate and evacuate the area.
- Notify supervisor and a PNM ESD Spill Response Contact.
- Use personal protective equipment (PPE) and avoid direct contact.
- Stop the source of the spill (if it is safe) or take measures to get it stopped.
- Stop spill flow with absorbent materials, earthen berms, or by creating a depression ahead of the spill.

If in doubt about any action, please call a PNM ESD Spill Response Contact:

PNM Environmental Services Department Spill Response Contacts

Steve Lucero 241-2029 (work) 362-1469 (cell) 323-4123 (home)

Ron Fields 241-2023 (work) 220-1626 (cell) 872-1579 (home)

Robin DeLapp 241-2016 (work) 362-0730 (cell) 344-3870 (home)

If spill is uncontrolled or if public health and safety is threatened, call 911 immediately.

1. FACILITY OWNER and OPERATOR

A. Facility Owner, Address, Telephone

Public Service Company of New Mexico (PNM) Alvarado Square Albuquerque, New Mexico 87158 (505) 241-4512

B. Facility Operator, Address, and Telephone

Public Service Company of New Mexico (PNM) Alvarado Square Albuquerque, New Mexico 87158 (505) 241-4512

2. FACILITY CONTACT

Dan Engert, Compressor Plant Manager Public Service Company of New Mexico (PNM) Alvarado Square, MS 1007 Albuquerque, NM 87158 (505) 241-4512

3. FACILITY DESCRIPTION

The Animas Compressor Station is located in the SE ¼ of Section 15, Township 29 North, Range 13 West, San Juan County, New Mexico. The facility is located on the south side of the Animas River on the northeast corner of the Animas Power Plant on Hydro Plant Road and U. S. Highway 64 in Farmington, New Mexico.

A. Facility Operations

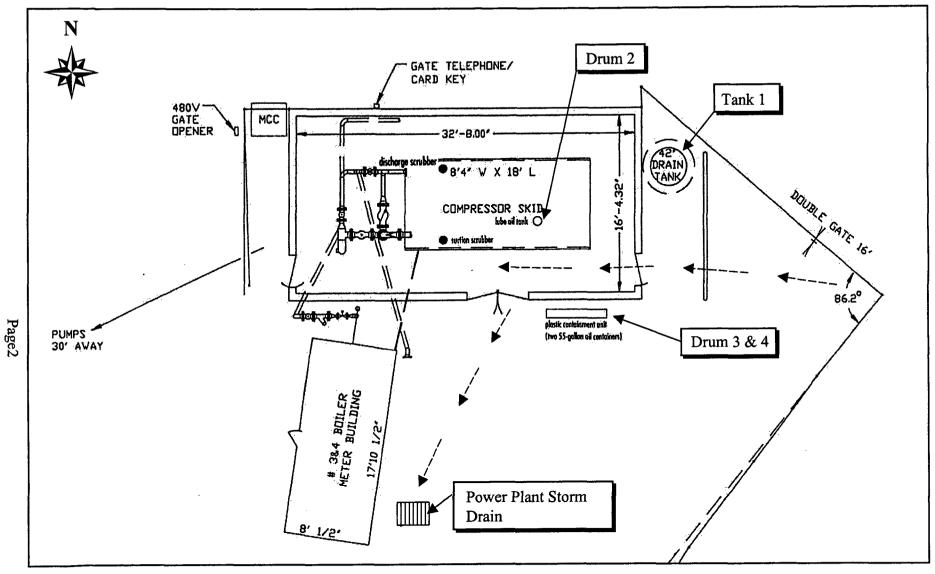
Animas Compressor Station is a natural gas compressor station consisting of two (2) Aerial natural gas compressor engines and auxiliary equipment including oil storage tanks. Figure 1 illustrates the facility layout and surface drainage diagram.

Natural gas enters the facility through underground lines on the north side, passes through a suction scrubber to the compressors that are driven by a 200 hp electric motor. The gas exits the facility through a discharge scrubber and into the adjoining Animas Power Plant.

Fresh water is trucked in and used to clean or wash-down the compressor engines. Contaminants in the water consist of detergent and lube oil that is generated on the skid. The usage rate of wash-down water is estimated at 20 gallons per year. Water used in washing the compressors is collected in a 600-gallon below-grade oily wastewater tank (Tank 1) that sits outside the eastern gate. This used water is transported via 2-inch aboveground pipes.

The engine oil utilized in the compressor engines are changed based on compressor run-time and used at a rate of 100 gallons per year. The lube is stored in a 55-gallon tank mounted on the skid (Drum 2). The used oil is transferred via 2-inch aboveground pipeline to two 55-gallon drums (Drums 3 & 4). Two-inch aboveground pipes transport lube oil to the compressors.

The facility operates 4-5 days a month depending upon gas demand. Personnel are typically at the facility approximately 15 minutes per day.



Approximate direction of surface water flow

Figure 1. Facility Layout & Surface Drainage
ANIMAS COMPRESSOR STATION
Created by: Wil Nez

April 5, 2002

Potential discharges of oil and hazardous materials to the waters of New Mexico are regulated at the State level by New Mexico's Oil Conservation Division (OCD). This facility operates under a Groundwater Discharge Plan, which is also maintained at the facility.

B. Facility Storage

ID	Contents	Volume	Tank	Tank	Туре	Open or	Leak Detection?
			Diameter	Construction		closed top?	
Tank 1	. Oily wastewater	600-gallon	42 inch	Steel .	Partially buried	Open	Yes
Drum 2	Lube oil	55-gallon		Steel	Drum	Closed	None
Drum 3	Used oil	55-gallon		Steel	Drum	Closed	None
Drum 4	Used oil	55-gallon		Steel	Drum	Closed	None

The total facility potential storage capacity is 765 gallons. Total oil storage potential capacity is 765 gallons. Process vessels, such as the suction scrubber and discharge scrubber, utilize and contain oils; however, their storage capacity is not included in this total. Daily throughput and storage amounts for the process vessels vary according to inlet processes resulting in varying storage amounts. The tank volumes were taken from tank nameplates or calculated from field measurements. The ID numbers correspond to the tank numbers on the facility diagram (see Figure 1).

Facility transfer operations involve aboveground piping, valves, gauges, compressors and other mechanical devices used to transfer oil and wastewater from one area to another within the facility.

Transfer of SPCC-regulated material from the facility is accomplished via truck. The facility receives products as needed and oils are delivered in 55-gallon containers.

Oily wastewater is stored in a partially buried tank (Tank 1). Mesa Environmental, a licensed recycling contractor, removes the used oil as needed. Oily wastewater is drained and taken as needed to a disposal facility owned and operated by TnT Construction, Inc.

C. Facility Drainage Pathway and Distance to Navigable Water

The Animas Compressor Station is located approximately 300 feet southeast of the Animas River (see Figure 2). The compressor unit is enclosed within a cinder block wall that helps to contain storm-water. Any storm-water leaving the facility would flow toward a municipal storm drain that is located approximately 40-feet to the south in the power plant yard and flow directly into the Animas River approximately 200-300 feet from the inlet.

4. SPILL HISTORY

No unintentional discharges have been reported at this facility within the past year. The cinder block wall and concrete thresholds at each exit would assist in containing any possible spill from the 55-gallon lube oil drum mounted on the side of the compressor unit. Supplementary containment below the drum will be installed during the next annual maintenance program.

5. POTENTIAL SPILL PREDICTIONS, VOLUMES, RATES, AND CONTROL

Listed below are the typical categories of potential spill events that could occur at the facility due to failure of equipment. These examples are applied to the worst-case instances of failure for the largest oil container. However, several other unpredictable factors might occur during a spill event that would cause more than one potential failure to occur at once. Such factors may cause the potential spill volumes or rates to be much higher than the ones listed below. The facility owner is aware of such a possibility, and is prepared to act accordingly. The following table was adapted from an undated EPA sample SPCC Plan. Italicized items were changed to reflect the capacity of the facility.

Site Spill Potential		
Potential Spill Events	Volume Released	Spill Rate
Complete failure of a full tank	Up to 600 gallons	Instantaneous
Partial failure of a full tank	1 to 599 gallons	Gradual to instantaneous
Tank overfill	1 to several gallons	Variable
Pipe failure	Up to 600 gallons	240 gpm
Leaking pipe or valve packing	Several ounces to several gallons	Variable
Leak during truck loading or unloading	1 to several gallons	Variable

6. PREVENTION MEASURES PROVIDED

PNM has implemented policies and procedures intended to design, maintain, inspect, and operate facilities in a safe and accident-free manner. Please refer to the PNM *Gas Operations Manual* located at each facility for these policies and procedures which include (but are not limited to) the following: corrosion control (CC-001 and CC-004); operations, maintenance, and inspections of compressor stations (M-009, M-004, M-P02); operation and maintenance of valves (CM-P11); emergency planning maintenance (ED-P05); safety meeting procedures (AP-P05); and the excavation of contaminated soil (AP-030). These sections are included in Appendix 6 for convenience.

A. Drainage Controls

(i) Drainage from diked storage areas

There are no diked storage areas. Two 55-gallon steel drums containing lube oil, miscellaneous sorbents and rags are held in a 240-gallon plastic located outside the SE corner of the facility. Tentative annual maintenance plans are to relocate the container inside the cinder block wall.

(ii) Valves used on diked area storage

There is no diked area storage.

(iii) Plant drainage systems from undiked areas

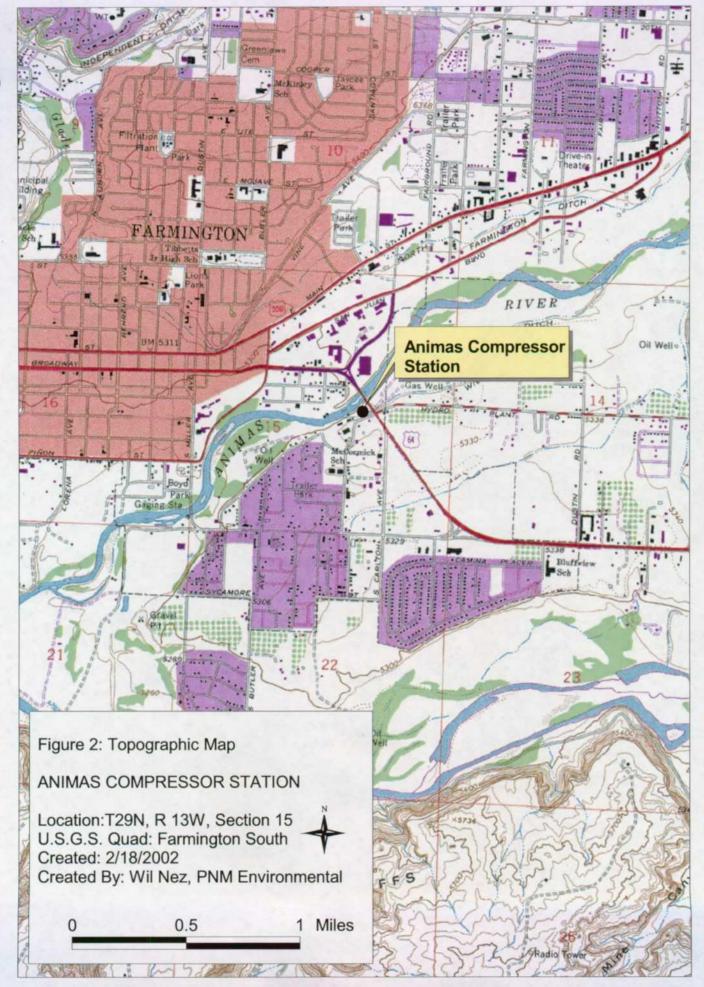
The facility is covered with gravel or asphalt. Facility topography is flat and slightly sloped from the east to west. The block wall surrounding the facility keeps most of the drainage on site.

(iv) Final discharge of drainage

Drainage is generally absorbed into the soil. Soil at the Animas Compressor Station is a Garland Loam, a well-drained loam formed on alluvial terraces. Depth to groundwater at the facility is 10 feet. Excess drainage would flow toward a municipal storm drain located 40-feet to the south

(v) Facility Drainage systems and equipment

The facility does not have a water collection and treatment system.



Page 5

B. Bulk Storage Tanks and Secondary Containment

(i) Tank compatibility with its contents

The 600-gallon oily wastewater tank is constructed of welded steel in accordance with API Standards 650 and 651 and is compatible with the contents that it holds. The tank is a double-walled tank with leak detection. Lube oil and used oil is stored in 55-gallon steel drums.

(ii) Diked area construction and containment volume for storage tanks

The oily wastewater tank (Tank 1) is double-walled and equipped with leak detection. Drum 2, a 55-gallon steel lube oil drum is mounted on the compressor skid. Spills or leaks from the drum would be retained on the skid and directed to the wastewater tank. The two (2) used oil 55-gallon drums (Drum 3 & 4) located outside the facility walls are stored in a 240-gallon plastic container that is large enough to contain leaks or spills.

(iii) Diked area, inspection and drainage of rainwater

The facility is visually inspected daily during regular facility inspections. Weekly inspections are performed. These inspections will be documented on modified existing inspections forms or on the forms located in Appendix 3.

Rainwater that collects on the compressor skid is generally allowed to evaporate. Appendix 1 includes a sample drainage discharge report form if one is required.

(iv) Corrosion protection of buried metallic storage tanks

There are no completely buried metallic storage tanks at the Animas Compressor Station.

(v) Corrosion protection of partially buried metallic tanks

The partially buried tank at the Animas Compressor Station is double-walled and double-bottomed and has a non-corrosive coating. Pipe-to-soil testing is used to test union integrity.

(vi) Aboveground tank periodic integrity testing

Facility personnel visually inspect the ASTs during operating hours. Inspections are conducted weekly to examine the exterior of the tanks and the containment areas. These inspections will be documented on modified existing inspections forms or on the forms located in Appendix 2. In accordance with API 653, every ten years, or more often when necessary based on visual inspection or monitoring results, the ASTs will be drained, cleaned, inspected, repaired, if necessary, and painted. Partially buried tanks are considered to be aboveground tanks and are subject to the same requirements as other aboveground tanks under the provisions of 40 CFR 112 due to their potential threat to surface waters.

(vii) Control of leakage through internal heating coils

There are no tanks at the Animas Compressor Station that are equipped with internal heating coils.

(viii) Tank installation fail-safe engineered

The partially buried tank at the Animas Compressor Station is equipped with a visual gauge. The tank has appropriate ventilation for fill and withdrawal rates to prevent spillage resulting from excess pressure within the tanks. All tank valves and other valve drains that could allow flow

from tanks are secured in the closed position when not in use. The tank is not equipped with an alarm system.

(ix) Observation of disposal facilities for effluent discharge

Water from the oily wastewater tank is removed by vacuum truck and disposed of in accordance with federal, state, and local regulations.

(x) Visible oil leak corrections from tank seams and gaskets

Visible oil leaks are reported to the maintenance department through a work order system, so that they can be fixed immediately. The maintenance department informs the plant operator when the repair has been completed or if additional time is needed to obtain parts and remedy the leak. Measures will be taken to minimize and mitigate the leak, while awaiting repair. Operations personnel clean up spilled oil immediately. Oil spill cleanup supplies are kept at the facility.

(xi) Appropriate position of mobile or portable oil storage tanks

There are no mobile or portable oil storage tanks currently stored at the Animas Compressor Station.

C. Facility Transfer Operations:

(i) Buried piping installation protection and examination

There is no underground piping at the Animas Compressor Station.

Each compressor is equipped with an emergency shut down system that shuts down the compressor in the event of a significant change in pressure or temperature in its lube oil system. An alarm will sound in the control room in the event of a shut down.

(ii) Not-in-service and standby service terminal connections

Pipelines that are out of service are evacuated and blank flanged.

(iii) Pipe supports design

All process piping that transfers oil at the Animas Compressor Station is aboveground. All the piping is located at ground level and does not require pipe supports.

(iv) Aboveground valve and pipeline examination

Operations personnel observe aboveground valves during site inspections. Aboveground valves are examined during the weekly inspection discussed in Section E on page 8. These inspections will be documented on either modified existing forms or on the form located in Appendix 3.

(v) Aboveground piping protection from vehicular traffic

All process piping that transfers oil at the Animas Compressor Station is aboveground and is protected from vehicular traffic.

D. Facility Car and Truck Loading/Unloading Operations

(i) Loading/unloading procedures meet DOT regulations

Unloading is conducted by licensed, outside vendors. PNM requires all vendors to comply with DOT regulations in 49 CFR Part 177 and facility standard operating procedures. All transfers between tank trucks and facility tanks are conducted manually to prevent uncontrolled releases

from storage tanks and tank trucks. Loading/unloading connections are securely sealed when not in use.

(ii) Secondary containment for vehicles adequate

Unloading from the oily wastewater tank occurs just east of the facility fence in an uncontained area within the property boundaries.

When loading tank trucks, spill pads or basins are placed below transfer valves to contain leaks and small spills that might otherwise be deposited on the ground surface. PNM will implement best management practices, such as portable curbing, catchment basins, and temporary trenches to retain the maximum capacity of any single compartment of trucks that load or unload at the facility. PNM will revise the unloading methods so that the transfer occurs in a contained area. PNM will post truck loading and unloading procedures at the loading and unloading area.

(iii) Warning or barrier system for vehicles

PNM will post warning signs in all the unloading areas to prevent vehicular departure before disconnecting flexible or fixed transfer lines.

(iv) Vehicles examined for lowermost drainage outlets before leaving

PNM will post warning signs in the unloading areas to remind drivers to examine drain outlets prior to departure. A trained PNM employee is present to observe all loading/unloading and fueling operations.

E. Inspections/Record Keeping

Inspection procedures include facility inspections conducted weekly and records of these inspections are documented and signed by the inspector or plant manager. During the weekly inspections, all tanks, containment structures, valves, pipelines, and other equipment are inspected. Every four weeks, spill-prevention devices are inspected during the weekly inspection. Checklists, similar to those found in Appendix 3, will be used for these inspections.

Inspection, training, and tank integrity testing records will be retained for at least three years at the facility.

F. Site Security

(i) Fencing

The entire facility is enclosed by wire fencing and secured gates. Gates are locked when the facility is unattended.

(ii) Flow valves locked

All tank valves are closed and locked when not in use.

(iii) Starter controls locked

Starter controls are located within a secure area of the facility office. Controls are locked in the "off" position when not in use.

(iv) Pipeline loading/unloading connections securely capped

Pipeline connections are securely capped when they are not in use and when they are in standby service for an extended time. All out of service pipelines are evacuated of their contents.

(v) Lighting adequate to detect spills

Lights illuminate the compressor area of the facility to prevent vandalism. Portable lights are available to detect spills during nighttime hours.

G. Personnel Training and Spill Prevention Procedures

(i) Personnel instructions

If there is a spill event in progress, please refer immediately to the Spill Response Procedures located at the beginning of this document.

Various types of spill events may occur at the facility. PNM personnel have been instructed and trained to respond to contained spills, minor, controlled spills, and uncontrolled spills. PNM is confident that these response procedures can be altered as necessary to address spills that do not specifically fit into one of these three categories.

PNM personnel receive ongoing instruction in the operation and maintenance of equipment to prevent the discharge of oil and degradation of the environment. All PNM employees are required to have safety training that includes spill prevention methods.

Reportability of the various spill types depends on the substance and quantity spilled. To determine reporting applicability, PNM Environmental Services personnel will refer to the *PNM Spill Manual*. The manual contains documentation forms and reporting guidelines to follow in the event of a spill. The facility owner is aware that, according to 40 CFR 112.4, "in the event of an oil spill of 1,000 gallons or more into any of the navigable waters of the US or adjoining shorelines, or a discharge of harmful quantities of oil in two events within a twelve month period" from the facility, they are required to submit a copy of the facility's SPCC Plan to the EPA Region VI administrator within 60 days of the spill event. Additionally, in the event of such a spill, the facility owner will submit copies of the Plan to proper State and local authorities as outlined in the *Spill Manual*. Primarily, the New Mexico OCD regulates spills at the facility. Therefore, facility personnel will contact OCD in the event of a spill in accordance with OCD guidelines. Copies of necessary reporting forms are located in the *Spill Manual*.

(ii) Designated person accountable for spill prevention

Mr. Dan Engert is the designated person accountable for spill prevention at Animas Compressor Station.

(iii) Spill prevention briefings

The Animas Compressor Station personnel will report regularly to operating personnel on the status of SPCC plan compliance and any issues surrounding oil spills. Briefings will highlight and describe known spill events or failures. Employee feedback and recommendations are encouraged in spill prevention and operation. Sign-in sheets, which include the topics of discussion at each meeting, will be maintained for documentation.

The SPCC plan will be kept accessible to all Animas Compressor Station employees.

H. Spill Control Equipment:

Spill control equipment on site includes absorbent pads, granular absorbent, empty drums, brooms, racks, and shovels.

I. Emergency Contact:

National Response Center: 1-800-424-8802 NM Oil Conservation Division (505) 476-3440 Dan Engert, PNM Compressor Plant Manager (505) 241-4512

PNM Environmental Services Department Spill Response Team Contacts

Steve Lucero (work) 241-2029 (cell) 362-1469 (home) 323-4123

Ron Fields (work) 241-2023 (cell) 220-1626 (home) 872-1579

Robin DeLapp (work) 241-2016 (cell) 362-0730 (home) 344-3870

APPENDIX 1 DRAINAGE DISCHARGE REPORT FORM

Drainage Discharge Report Form

Facility Name:		
Operator Name:		
Containment Area for Which		
Tanks?		
Date and Time Containment Area	Date	Time
Valve Opened:		·
Date and Time Containment Area	Date	Time
Valve Closed:		
Appearance of Water at Time of Pu	imping or Dis	scharge:
Signature of Operator:		

APPENDIX 2 TANK INSPECTION REPORT

AST Inspection Report Form

Date:		
Inspector:		
Facility:		
Tank ID &		
Contents:		
Weather Stripping or Flashing	Are all pieces tight against shell?	
	Are any pieces missing or require repairs? If so, how many?	
Hoses and Piping	Describe general apperance of hoses.	
	Any leaks?, If so explain.	
	Aboveground piping free of leaks?	
Roof Ladder	Does ladder appear to roll easily or need repairs?	
Contamination	Is roof free of oil and water? If not, explain.	
Corrosion Control	Note general appearance of paint on shell, roof, ladder, and structural members	
	Is rusting or pitting occurring on any of the above? If yes, explain where and repairs needed.	
	Are all insulating flange washers and sleeves in place? If not, explain.	
	Are all ground and/or anode straps in place? If missing, explain.	
	Are high-level alarms functioning properly? Tested to verify?	
	Other observations?	
Any damaged or problem areas?		1
Are remote and side gauges working?		
	,	

APPENDIX 3 WEEKLY FACILITY INSPECTION REPORT AND CHECKLIST

Weekly Facility Inspection Checklist

Facility:			X=Satisfactory
Date:		NA=Not Applicable O = Repair or Adjustment	
			Required
Time:			C=See comment under Remarks/Recommendations
Inspector:			Remarks/Recommendations
Drainage	Any noticeable oil sheen on runoff.	ASTs .	Tank surfaces checked for signs of leakage.
	Containment area drainage valves are closed and locked.	-	Tank condition good (no rusting, corrosion, pitting).
	Oil/water separator systems working properly.	-	Bolts, rivets, seams in good condition. Tank foundation intact.
	Effluent from oil/water separator inspected.		Level gauges and alarms working properly.
	No visible oil sheen in containment area.		Vents are not obstructed.
	No standing water in containment area.		Valves, flanges, gaskets are free from leaks.
		-	Containment walls are intact.
Pipelines	No signs of corrosion damage to pipelines or supports. Buried pipelines are not exposed. Out-of-service pipes capped. Signs/barriers to protect pipelines from vehicles are in place. No leaks at valves, flanged or other fittings.	Truck Loading/ Unloading Area	No standing water in rack area. Warning signs posted. No leaks in hoses. Catch basins free of contamination. Containment curbing or trenches intact. Connections are capped or blank-flanged.
Security	Fence and gates intact. Gates have locks. ASTs locked when not in use. Starter controls for pumps locked when not in used. Lighting is working properly.	Training	Spill prevention briefing held. Training records are in order.
Remarks/Reco	ommendations:		

APPENDIX 4 CERTIFICATION OF THE APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA CHECKLIST

CERTIFICATION OF THE APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA CHECKLIST

FACILITY NAME: Animas Compressor Station

FACILITY ADDRESS: Township 29 North, Range 13 West, Section 15 San Juan County, New Mexico

- 1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?

 Yes

 No X
- 2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area? Yes
- 3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the formula in Attachment C-111, Appendix C, 40 CFR 112 or a comparable formula ') such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II, and III to DOG/NOAA's "Guidance for Facility and Vessel Response Environments" (Section 10, Appendix E, 40 CFR 112 for availability) and the applicable Area Contingency Plan.
- 4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula (Attachment C-111, Appendix C, 40 CFR 112 or a comparable formula¹) such that a discharge from the facility would shut down a public drinking water intake²?

Yes No X

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?

Yes

No X

¹If a comparable formula is used, documentation of the reliability and analytical soundness of the comparable formula must be attached to this form.

²For the purposes of 40 CFR part 112, public drinking water intakes are analogous to public water systems as described at 40 CFR 143.2(c).

CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.		
Signature	04/25/02 Date	
Name: OANIEL J. ENCERT		

Title: MANACER, COMPRESSOR DEPT

from 40 CFR 112 Appendix C, Attachment C-11

APPENDIX 5 SPCC PLAN CHECKLIST FOR BULK OIL STORAGE FACILITIES

SPCC PLAN CHECKLIST FOR <u>BULK OIL STORAGE</u> FACILITIES

I. II. III	Operator and Owner Addresses and Phone Nos. Day-to-day Operations and Facility Background Receiving Water/Probable Flow Paths (e.g., facility storm drain, street storm drain, WWTP outfall, overland to river or stream, flood control pond)
IV.	Copy of SPCC Plan/Site Diagrams
	Certification of engineer: 112.3 (d).
	Reviewed within past three years: 112.5(b).
	Full approval of appropriate level management: 112.7. Spill history: 112.7(a)
	Spill predictions: 112.7(b)
	Diversionary structures and containment: 11 2.7(c)
v.	SPCC Measures
112.7(e)(1) Facility drainage:
i)	Dike drainage via valves or manually controlled pumps.
	No flapper-type drain valves on diked areas. Dike drain valves manual control.
	Undiked area drains to catch basin.
iv)	If no drain prep as above. Diversion system to return oil.
v)	If drainage water not moved by gravity flow, then redundant lift pump setup.
112.7(e)(2) Bulk storage tanks:
i)	Material and construction compatible with contents.
ii)	Secondary containment for largest tank + precipitation, and
	dikes sufficiently impervious to spilled oil.
—,	or trench enclosure draining to catch basin.
iii)	Rainwater drainage (into a storm drain or water course) bypassing in plant
	treatment okay if:
	bypass valve normally sealed closed, <u>and</u> inspection and compliance with water quality standards, <u>and</u>
	
iv)	Buried tanks protected against corrosion/regular pressure testing.
v)	Partially buried tanks protected against corrosion.
vi)	Surface tanks integrity tested via hydrostatic, visual inspection, or nondestructive
_ ′	shell thickness methods. Construction of tanks base adequate.
vii)	Internal heating coils are closed loop or treated and monitored.
	Fail-safe engineering on all tanks, new and old, via high liquid level alarms or
	high liquid level pump cutoff devices, or audible/code warning, and
	regular testing of liquid level sensors.
ix)	Water discharge facilities inspected regularly (NPDES).
x)	Visible leaks on tanks and piping corrected (Protocol).
xi)	Secondary containment for largest portable storage tank.
	Portable tank area free from periodic flooding or washout.

112.7(e)(3) Facility transfer operations:
i)	Buried piping protected against corrosion.
ii)	Out-of-service pipes capped with origin marked.
iii)	Pipe supports minimize abrasion, corrosion, sagging.
iv)	Regular inspection of surface pipe and valves.
	Regular pressure testing for pipes with no secondary containment.
_v)	Signs to warn vehicles about piping.
112.7(e)(4) Facility loading/unloading rack:
i)	Follow DOT procedures for loading/unloading tank cars and tank trucks.
ii)	Secondary containment for largest vehicle compartment (or quick drainage
	system).
ii)	Prevention of early vehicle departure via warning signs, physical barriers, or
	interlocked warning light.
iv)	Vehicles examined for leakage at all outlets prior to departure.
112.7(e)(8) Inspections and records:
_	Written procedures records kept for three years of inspections and
•••••	Records (inspections, discharges, training, briefings) kept for three years.
	e)(9) Security:
(i)	Fully fenced.
	Gates locked when plant unattended.
(ii)	Master flow and drain valves of tanks locked closed.
(iii)	Starter control locked "offs or located where only the authorized have access.
(iv)	Out-of-service pipelines capped or blank-flanged.
(v)	Lighting adequate for night spill detection and deterring vandals.
112.7((e)(10) Personnel, training and spill prevention procedures:
(i)	Personnel instructed in equipment operation and oil regulations.
(ii)	One person accountable for spill prevention.
(iii)	Owner/operator schedules regular briefings.
	112.20(e) Applicability of Substantial Harm Criteria Checklist Completed.

APPENDIX 6
Selected PNM Gas Operations Manual Policies and Procedures Pertinent to
Spill Prevention Control and Countermeasure



Corrosion Control ◆ Policy

Corrosion

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General

Corrosion of underground pipe occurs when corrosion currents flow from the pipe into the electrolyte (soil). To prevent corrosion, our Company cathodically protects our steel pipelines.

Related Policies and Procedures

Policy ED-006 (Pipe Selection)
Policy CM-015 (Corrosion Control)
Pipeline Corrosion Control (Located on PNM's Intranet)

Corrosion Control

We can prevent the occurrence of corrosion by forcing direct current from an external source to flow onto the surface of a pipeline and regulating the amount of current flow. This overpowers any corrosion current discharging from the anodic areas on the pipeline.

There are two types of systems commonly used to supply direct current sources:

- 1. Sacrificial anodes Magnesium is the most common anode that we use.
- 2. Impressed current systems Rectifiers are the most common source for impressed current systems.

Purpose of Corrosion Control

The penalties due to failures from corrosion can be extremely severe and can include the following:

- 1. Loss of life or injuries.
- 2. Property damage.
- 3. Premature replacement of our piping system.
- 4. Interruptions in plant operations.
- 5. Loss of gas.

We should design and maintain our corrosion program with these penalties in mind. We should also look at the economics of the situation to make sure that our company makes a profit.

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The cost of maintaining plant and equipment is an operating expense which directly reduces profit. Our corrosion prevention program should be efficient. The ideal corrosion program reduces corrosion to the point of minimum total cost per year of service. Of course, governmental regulations can significantly affect economic considerations.

Purpose of Coatings

The purpose of using coatings is to reduce the flow of corrosion current from the pipe. We accomplish this by applying coatings to isolate the metal pipe from the surrounding soil.

If it were possible to maintain a perfect coating around the pipeline, no corrosion would take place. However, coatings develop holidays (holes in coating). Holidays allow corrosion current to flow into the soil or absorb moisture, which reduces the insulating value of the coatings. Corrosion currents leaving coated pipe through these holidays can cause severe corrosion problems.

To protect coated pipelines from this severe corrosion, we install cathodic protection devices (i.e., anodes and/or rectifiers). When current from these devices enters the pipeline, it is so powerful that the corrosion current cannot leave the pipe at the holidays. Thus, it reduces or stops the corrosion process.

When the coating of a pipeline has a multitude of, or large holidays, the cathodic protection devices have to provide a larger amount of current to protect the pipe from corrosion. Therefore, we must properly install and patch coatings so there are as few holidays as possible.

Types of Coating Materials

Coatings, by themselves, may not be the one perfect answer to corrosion. However, they are an extremely effective weapon when properly used. Most operators plan coatings for all steel pipelines as a matter of course. A properly selected and applied coating provides all the protection necessary on most of the pipeline surface. On a typical well-coated pipeline, this should be better than 99 percent.

Since the start of large scale pipelining, there have been, and continue to be, many developments in coating materials and protective coating systems. Our goal is to find materials that have the best possible electrical and mechanical strength, ease of application, and stability in long term performance, all at a cost compatible with economical pipeline construction.

Many types of high quality coatings are in use. Some of the types of coatings commonly used include the following:

- 1. Coal tar enamel.
- Coal tar tapes.

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- 3. Extruded tapes of various plastic formulations, asphalt-base, thin films plastic coatings and others.
- 4. Epoxy.
- 5. Fusion-bonded epoxy.

This policy does not provide a discussion on the methods of application and standards applicable to these coatings. However, you may obtain detailed information on each type of coating from its manufacturer.

All coatings must be approved by the Chief Engineer before use.

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Corrosion Control ◆ Policy

Operations/Maintenance Corrosion Control

Issued	Revised	Number
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General

This policy describes the records and forms used to maintain accurate and up-to-date corrosion control system records.

Related Policies & Procedures

Policy CC-002 (Pipeline Design Corrosion Control)
Policy CC-003 (Maintaining Corrosion Control)

Records

Each operating location maintains the following records of the corrosion control system.

- 1. Index Map: This map, divided into areas (or sections), shows the entire cathodic protection (CP) system(s) and is posted or otherwise made available (see Exhibit A for an illustration of a sample index map). Each area has an assigned reference number that corresponds to the number on any file that contains information about that area. The index map may have a small scale, similar to an area map, and should be currently available.
- 2. Cathodic Protection File (Area Maps/Folders/Books): Keep all CP records in file folders or in books and on maps. You do not need to file maps with the other records. In operating locations that contain extensive insulation points (i.e., in large distribution systems), these "area" maps are further broken down into individual locations.

Ensure that area maps (see Exhibit B) are currently available. They should have a scale that allows sufficient detail for locating facilities and yet encompasses as much of the system as possible. A scale of 1 inch = 600 feet is generally adequate for distribution facilities, whereas you may use a smaller scale for transmission lines or other types of facilities.

Necessary Records: Maintain the following records to comply with applicable regulations:

- a. Maps that show the location of all the following:
 - 1) Cathodically protected piping.
 - 2) Resistance bonds.
 - 3) Rectifiers.
 - 4) Insulating points.

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b. Surveying and monitoring records as prescribed in Policy CC-002, Pipeline Design Corrosion Control, and Policy CC-003, Maintaining Corrosion Control. The type of record you keep depends upon the method of CP used, the type of survey, and the method used to monitor the system. The applicable forms to use for this purpose are described in item 5., below.

5. Forms:

Maintain monitoring and survey records on the following applicable forms:

Form 755-336 & 755-681, Galvanic Anode Record: Both PNMGS - Service Line Order (SLO, 755-336) and PNMGS - Main Report (755-681) forms have a GALVANIC ANODE RECORD section. Use SLO form for anode installations on a service, and Main Report form for anode installations on a main. Refer to CM-P01 for instructions on how to complete the Galvanic Anode Record section for the SLO form, and CM-P08 for the Main Report form. Complete Galvanic Anode Record section as accurately and completely as possible. Usually, it is completed in the field at the job site. Use SKETCH section on either form to show exact location of anode installations and protected lines. Show accurate measurements, street names, and addresses on the sketch if applicable. Both SLO and Main Report forms must be kept in a permanent file for the life of the system. See Exhibits C and D.

Form 755-975, Cathodic Protection Unit Record: Use this form to record information that relates to all types of impressed current systems. Provisions are made for recording DC voltage and current, AC kilowatt hour meter readings, the efficiency of the unit, and the operating cost. The back has space for comments and operation and maintenance notes (see Exhibits E and F).

Form 755-976, Cathodic Protection System Record: Use this form to record pipe-to-soil potentials (P/S) and other information that relates to maintaining CP systems. The lower portion of the back side of the form is blank so that you can sketch the area or section that shows insulation points and locations of protected pipe (see Exhibits I and J).

Form 755-977, Interference Bond Record: Use this form to record information that relates to interference and resistance bonds. Blank space is provided on the front of the form so you can sketch our Company's line and the foreign line or structure. Additional spaces are provided on the back for dates and for potential, current, and resistance readings (see Exhibits K and L).

Form 755-979, Cathodic Protection Checklist for Insulated Facilities: Use this form to record tests on separately protected service lines and short sections of protected mains that are less than 100 feet in length (see Exhibits N and O).

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Form 755-980, Atmospheric-Corrosion Inspection Record: Use this form to record all inspections, tests, and surveys made on our Company's aboveground plants, excluding all metering and regulating facilities (see Exhibit N).

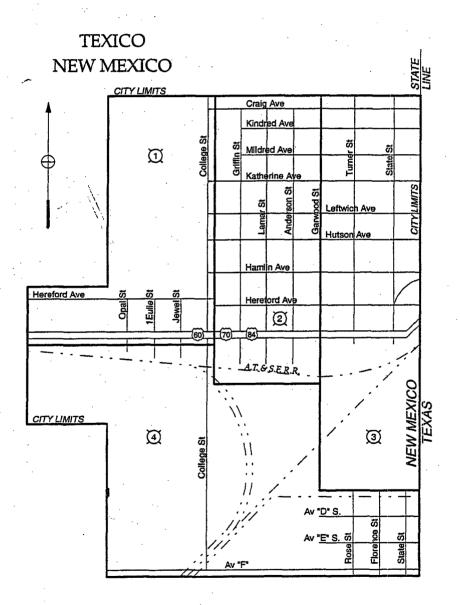
Form 755-040, Leak Report: Use this form to record leak investigations and repairs on Company-owned lines and to record if internal corrosion is present. (Make a separate special report when you find internal corrosion.)

Form 756-197, Monthly Corrosion Report: Prepare this form for each area or location for each reporting period (26th through the 25th). Forward the original to the Gas Engineering and provide copies for local and administrative use as needed (see Exhibit O).

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Exhibit A Sample Index Map

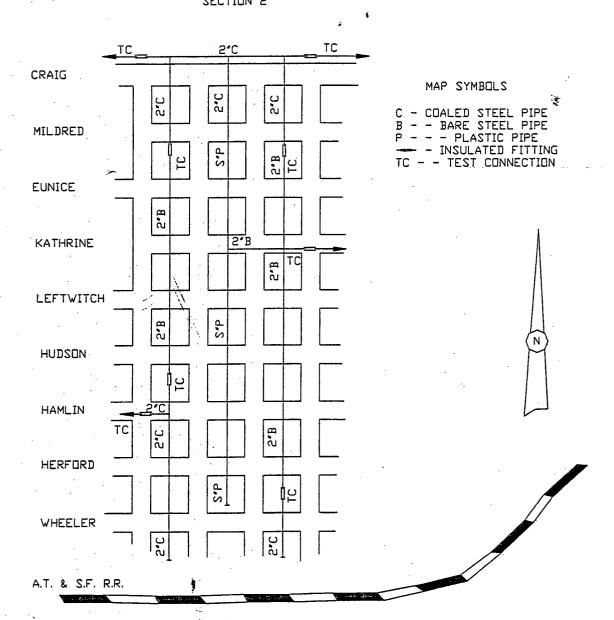
- 1. Locate the CP section of interest.
- 2. Note the reference number.
- 3. Use this number to locate maps, files, computer files, or books assigned this number.
- 4. Locate information you want that relates to the CP system in any of these files or books.



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Exhibit B Sample Corrosion Control Area Map

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Exhibit C Form 755-336 and Form 755-681, Galvanic Anode Record

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Exhibit D

Form 755-336 and Form 766-681, Show Galvanic Anode Installations on SKETCH

(NOTE: Form shown is a Main Report Form #755-681)

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EXHIBIT E

Form 755-975, Cathodic Protection Rectifier/Unit Record (Front)

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Exhibit F Form 755-975, Cathodic Protection Rectifier/Unit Record (Back)

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Exhibit G Form 755-976, Cathodic Protection System Record (Front)

PNM Gas Services

CATHODIC PROTECTION, SYSTEM RECORD

755-976 9/94

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CODE REFERENCE

C=COATED B=BARE P=PLASTIC

CRITERIA: 1=0.85

2=300MV SHIFT 3=100MV POLARIZATION DECAY 4=TAFEL(E-LOG1) 5=NET PROTECTIVE CURRENT

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Exhibit H Form 755-976, Cathodic Protection System Record (Back)

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Exhibit I

PNM LINE		MAP NO.	BOND NUMBE	NM (
BOND LOCATION	· ·			
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Exhibit J Form 755-977, Interference Bond Record (Back)

BOND READINGS

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Exhibit K Form 755-979, Cathodic Protection Checklist for Insulated Facilities (Front)

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Exhibit L Form 755-979, Cathodic Protection Checklist for Insulated Facilities (Back)

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Issued	Revised	Number
02/09/76	09/28/01	CC-004

Exhibit M Form 755-980, Atmospheric Corrosion Inspection Record

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Issued	Revised	Number
02/09/76	09/28/01	CC-004

Exhibit N Form 756-197, Monthly Corrosion Report

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Preparation of Form 756-197, Monthly Corrosion Report

Refer to Exhibit P while following the instructions below:

- 1. Enter the name of the area or unit reporting. (If the corrosion activities are not directed by a single area corrosion supervisor, each corrosion unit within the area submits a separate report.)
- 2. Enter an "X" to indicate the function covered by the reporting unit.
- 3. Enter the month and year covered by the report. (The "month" extends from the 26th of the prior calendar month through the 25th of the current month.)
- 4. Enter the total figure of each size of anode installed during the reporting period by each type of installing group. Insert a heading for any nonstandard size of anode installed.
- 5. Enter the total number of rectifiers in the system for which you are responsible.
- 6. Enter the total number of rectifiers inspected, read, or serviced during the report month.
- 7. Enter the cumulative total of the item 6 entries for the report year to date.
- 8. Enter the total number in the system of interference bonds to other operators.
- 9. Enter the total number of interference bonds to other operators read or serviced during the report month.
- 10. Enter the cumulative total of the item 9 entries for the report year to date.
- 11. Enter the total number of "isolated facilities" in the system.

Note: "Isolated facilities" include isolated services, yardlines, and sections of main under 100 feet in length (see Section 192.465 of the Code of Federal Regulations). Unless all such facilities are currently identified, you may need to provide a realistic estimate of the number of such facilities. Adjust any such estimate as needed to reflect improved information.

- 12. Enter the total number of isolated facilities in the system that are protected as of the close of this report month.
- 13. Enter the number of isolated facilities for which protection was furnished this month for the first time.
- 14. Enter the number of protected isolated facilities that were performance checked this month.

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- 15. Enter the cumulative total of the item 14 entries for the report year to date.
- 16. Enter the number of meters re-insulated this month, whether by corrosion people or other service personnel.
- 17. Enter the number of valves insulated.
- 18. Enter the number of fittings bonded.
- 19. Enter the number of contacts cleared.
- 20. Enter the total paid hours of all corrosion personnel other than supervisory personnel on a fixed distribution. Account for this time as follows:
 - W.O. 70 Include all time chargeable to the following work orders:
 - 70°- Cathodic Protection Distribution Mains and Service
 - 71 Cathodic Protection Production and Transmission Lines
 - 72 Cathodic Protection Transmission Mains
 - 73 Cathodic Protection Replacement of Non-insulating Swivels

Operation & Maintenance - Include all time chargeable to any of the following accounts:

Production and Gathering

753100	Cathodic Protection - Field Lines - Operation
<i>764</i> 000	Cathodic Protection - Field Lines - Maintenance

Underground Storage

817100	Cathodic Protection - Lines - Operation
833000	Cathodic Protection - Lines - Maintenance

Transmission

856100	Cathodic Protection - Mains - Operation
863100	Cathodic Protection - Mains - Maintenance

Distribution

874600	Cathodic Protection - Mains - Operations
887600	Cathodic Protection - Mains - Maintenance

Other: Include all paid time off (i.e., vacations, holidays, illness, etc.) and all time charged to other work orders or other operating and maintenance accounts.

21. Enter the footage of pipe by size and by bare or wrapped that has been provided protection for the first time this period.

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- 22. Enter the footage of pipe by size and by bare or wrapped that has been restored to a satisfactory level of protection by the replacement of anodes, repair or replacement of a rectifier or by other means during this period.
- 23. Enter the miles of pipe throughout the system for which you are responsible by size and by bare or wrapped which is protected.*
- 24. Enter the total miles of pipe by size and by bare or wrapped throughout the system. Include both protected (item 23) and unprotected pipe.*
- *Update these two sections for the June report and the December report. Carry forward your June and December figures for the intervening months.
- 25. Enter a summary of the activities of the Corrosion Department for the period. Report the acquisition of new equipment, NACE certification of technicians, installation of ground beds and rectifiers, tests of new products and other items of interest not covered in the above report. Use the back of the form if the space allowed is inadequate.
- 26. Enter your signature and the date.



Measurement ◆ Policy

Operations/Maintenance of Compressor Stations

Issued	Revised	Number
04/01/71	02/14/01	M-009

General

Each operating location which is responsible for the operation and maintenance of compressor stations and similar major installations must have a program to ensure that they function properly.

Related Policies and Procedures

Policy M-010 (Operations/Maintenance of Structures)

Procedures

Each operating location must prepare and maintain detailed written procedures for starting, operating, and shutting down of all gas compressor units under its control.

Additional written procedures must be established for isolating the equipment for maintenance and/or alteration. These procedures must include instructions for purging all piping and equipment. They must also contain all necessary steps for each operation, for each unit, and for the station as a whole. Each station must keep copies of the procedures, and they must be given or made available to all operators of the equipment. We require posting of the line diagram at appropriate places in the station.

Emergency Action

Each operating location must prepare and maintain detailed procedures covering action to be taken in the event of an emergency at the station. These procedures shall contain the location of all emergency equipment (fire extinguishers, emergency shutdown stations, telephones, and similar facilities) and all emergency exits from the building(s) and fenced area(s).

Inspection

We are required to establish and maintain a regular inspection program for each compressor station. This inspection program must include the following:

- 1. An inspection and test of all relief devices (except rupture discs) to make sure that they are in good condition and set to function at the correct pressure.
- 2. A check of the operation of remote control shutdown equipment.
- 3. An inspection of the internal and external corrosion of piping and equipment.

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04/01/71	02/14/01	M-009

- 4. An inspection of all fire fighting and other emergency equipment.
- 5. A review of all operating procedures required by this policy section to make sure that the procedures are still appropriate and that all necessary drawings and materials are in place.

Inspections must be made at least once each calendar year, at intervals not exceeding 15 months. A written report must be prepared for each inspection indicating the conditions found, inadequacies noted, and corrective action taken.

Material Storage

We are required to store all materials in locations provided for that purpose. Do not store materials where they might impede the use of emergency exits.

All combustible or flammable materials must be stored in a separate building(s) that is constructed of fire-resistant material and that is a safe distance from the compressor building. However, a small amount of these materials may be kept in the compressor building for daily use.

Aboveground Gasoline or Oil Storage

All aboveground oil or gasoline storage tanks must be protected from fire in accordance with the National Fire Protection Association Standard No. 30.

Gas Detection and Alarm Systems

Compressor Station buildings must have gas detection and alarm systems installed unless:

- 1. 50% of upright side area is open;
- 2. it is located in an unattended field, <1000 hp.

Except when shutdown for maintenance, gas detection and alarms in compressor station buildings must continuously monitor for 25% LEL and, if detected, warn those inside.

The equipment must be maintained to function properly. This equipment must be tested during performance tests of the compressor station.



Measurement ◆ Policy

Design of Compressor Stations

Issued	Revised	Number
04/01/71	02/14/01	M-004

General

The design of compressor stations, including major additions and modifications of the buildings, gas piping, and equipment, shall be done only by qualified personnel familiar with the work. This policy presents the basic requirements for all design work associated with compressor stations.

Related Policies and Procedures

Policy M-005 (Design of Buildings)
Policy ED-006 (Pipe Selection)
Policy M-006 (Design of Pits and Vaults)

Location

Whenever possible, we build compressor stations in Class 1 and 2 locations. Do not locate a compressor station of more than 250 H.P. in a Class 4 location. When required by the situation, compressor stations may be located in Class 3 locations.

We are required to build all compressor stations on land that we own or that we lease as the sole lessee. The tract shall be of sufficient size to obtain the clearances required in this policy.

When selecting a location, remember to consider environmental requirements such as the need for air quality permits.

Buildings

Buildings shall comply with all of the design requirements contained in Policy M-005, Design of Buildings.

We must position the main compressor building far enough away from the adjacent property to minimize damage and spread of fire. Also, provide enough open space around station buildings to allow for free movement of fire fighting equipment.

Fences

Each fence around a compressor station must adhere to either one of the following requirements:

1. It must have at least two unobstructed exits and each must provide a convenient opportunity to escape to a place of safety.

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2. It must have other facilities that also provide convenient exit from the area.

All gates and other escape means must open outwardly from the inside without a key. No isolated areas within the fence are permitted. Gates and other escape means must be maintained to allow unhindered exit or escape in the event of an emergency.

Piping

All piping within compressor stations must comply with the requirements of Policy ED-006, Pipe Selection.

Vessels

Construct all heat exchangers and pressure vessels to comply with Section VIII, Unfired Pressure Vessel Section of the ASME Boiler and Pressure Vessel Code. All such units intended for service at pressures of 250 psi or more shall be certified and code-stamped by their manufacturer.

Liquid Removal

We must install adequate liquid removal equipment in compressor suction lines if there is a possibility of liquids entering the compressor in the gas stream. This includes both free liquids and entrained vapors that may liquefy at the anticipated pressure and temperature conditions. Each liquid separator must meet all of the following requirements:

- 1. It must have a manually operated means of removing the liquids.
- 2. It must have either automatic liquid removal facilities, an automatic compressor shutdown device or a high level alarm if slugs of liquid could be carried into compressors.
- 3. Its manufacturing must comply with this policy and according to Section VIII of ASME Boiler and Pressure Vessel Code, except that liquid separators constructed of pipe and fittings without internal welding must also be fabricated with a design factor of 0.40 or less.

Emergency Shutdown

The requirements of this section apply to all installations except unattended field compressors of 1,000 horsepower or less.

All compressor stations must have an emergency shutdown system which meets the following requirements:

- 1. It must be able to block gas out of the station and blow down the station piping.
- 2. It must discharge gas from the blowdown piping at a location where the gas will not create a hazard.

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- 3. It must provide for the shutdown of gas-compressing equipment, gas-fired equipment, and certain electrical facilities in the vicinity of gas headers and in the compressor building. Only electrical circuits that supply emergency lighting or those needed to protect equipment from damage may remain in service.
- 4. It must be operable from at least two locations, each of which is:
 - a. Outside the gas area of the station.
 - b. Near the exit gates in the station fence.
 - c. Not more than 500 feet from the limits of the station.

If the compressor station supplies gas, either directly or indirectly, to a distribution system that has no other source of gas available, we are required to design the emergency shutdown system so that it will function only when there is an emergency. The system must be prevented from causing an unintended outage when there is no emergency situation.

Pressure Relieving Devices

Each compressor station must have pressure-relief or other suitable protective devices. These devices must ensure that the actual pressure in the station piping and equipment does not exceed the maximum allowable operating pressure of the station by more than $10 \text{ percent } (1.10 \times \text{MAOP})$. Relief valve vent lines must extend to a location where the gas may be discharged without hazard. Provide over-pressure protection in the control piping loop of any pilots, regulators, actuators, flow controllers, etc. that have an MAOP which is lower than the maximum supply pressure in the control loop.

Other Safety Devices

Each compressor must have the following safety devices in addition to those required by previous sections of this policy.

- Prime movers other than induction or synchronous motors must have an automatic
 device to shut down the compressor before the speed of either the prime mover or
 the driven units exceeds a safe maximum speed.
- Each unit must have a shutdown or alarm device that operates in the event of inadequate cooling or lubrication of the compressor.
- 3. Each gas engine that operates with pressure gas injection must be equipped so that stoppage of the engine automatically shuts off the fuel and vents the engine intake manifold.
- 4. Each muffler for a gas engine must have vent slots or holes in the baffles of each compartment to prevent gas from being trapped in the muffler.

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04/04/71	02/14/01	M-004			

Fire Protection

We must provide all stations with fire protection devices that comply with the recommendations of the National Fire Protection Association and the American Insurance Association. If fire pumps are a part of these facilities, their operation must not be affected by the emergency shutdown system.

Identification

All emergency valves shall be clearly identified by signs. All piping shall be coded by painting it in the color recommended by the National Safety Council for its service. Lines may be painted in total or by banding at intervals of 10 feet or less. DO NOT remove or paint over identification plates or manufacturers specification tags.

Electrical

All electrical equipment and wiring must conform to the requirements of the National Electric Code, NFPA-70 (ANSI), or to local electrical codes, whichever are more restrictive.

Vaults and Pits

Our Company requires that the design and construction of all pits, vaults, manholes, and similar structures comply with the requirements of Policy M-006, Design of Pits and Vaults.



Measurement • Procedure

Station Inspection

Issued	Revised		Number		
11/07/75	02/1	4/01	M-P02		
Responsible Department		Affected Locations			
Measuremen		All Ga	s Company Locations		

Purpose

To establish standard practices for performing the annual safety inspection required each year for certain meter and/or regulator stations, in accordance with Policy M-008, Operations/Maintenance of Stations. This inspection is to make sure that all necessary equipment is installed and working properly, that the design of the station is as it should be, and that there are no dangerous or hazardous conditions present.

Required Annual Inspection

We are required to annually inspect the following stations:

- 1. District regulator stations regardless of size.
- 2. Border stations.
- 3. Customer meter/sets/stations that have a meter with a capacity greater than 4001cfh at ½" differential.
- 4. Other stations as specified.

Form 755-801, Regulator Station Safety Inspection Report

Form 755-801, Regulator Station Safety Inspection Report, is a quick, check-off type list of items that should be inspected for proper operation and safety. Most of the items are of the "OK-Not OK" type. Pressure and volume data is for determining if the station will perform properly. You must report to your supervisor anything that is "Not OK". It is the responsibility of your supervisor to see that necessary repairs or corrections are made as quickly as the situation requires. You must retain the original Regulator Station Safety Inspection Report in your local office file.

Exhibit 1 contains Form 755-801, Regulator Station Safety Inspection Report. The pages that follow the exhibit provide instructions for performing inspections and preparing the form. Each set of instructions refers to the section of the form it addresses by letter.

Related Policies and Procedures

Policy M-008 (Operations/Maintenance of Stations)
Policy M-023 (Testing Large-Size Rotary and Turbine Meters)
Procedure CA-P01 (Plant Retirement)

Issued	Revised		Number	
11/07/75	. 02/1	4/01	M-P02	
Responsible Department		Affected Locations		
Measurement		All Ga	s Company Locations	

Form 755-801, Regulator Station Safety Inspection Report Exhibit 1

~	STATION INSPECTION REPORT Form 755-301 Related M-P02: M-003: M-009: M-013: M-009: M-013:																		
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Issued	Revised		Number	
11/07/75	02/1	4/01	M-P02	
Responsible Department		Affected Locations		
Measurement		All Ga	s Company Locations	

# Form 755-801, Regulator Station Safety Inspection Report Station Identification Header (A, Exhibit 1)

- 1. Enter the applicable 2-digit district code (see Schedule I).
- 2. Enter the applicable 2-digit commercial office code (see Schedule I).
- 3. If the station is a District Regulator Station, assign the station your own 4-digit serial number and enter it to this block. Use any number you want from 0001 to 9999. In multi-town areas, you can start all over again with the 0001 to 9999 series for each different commercial office code. If the station is a Measurement Station with a P-Gas Facility Number, use this as the Station Number. If the station is a Large Customer Meter Station, use the Customer Premise Number as the Station Number.

The district code, plus the commercial office code, plus the number you assign will form the complete identification number of the station. Make a log sheet to keep track of these numbers so you will not duplicate them.

- 4. Enter the 3-digit location code.
- 5. Use a 2-digit code for each item of the date. For example: September 22, 1990 is entered as 09-22-90.
- 6. Enter the station or customer's name as it appears on our records. Normally, this is the name under which the customer is billed.
- 7. Enter the page number and the total number of pages required to complete the inspection.
- 8. Enter the specific address (i.e., street and town) for the station. For example: A district regulator station is in the alley on the east side of South Central Avenue. The nearest street address is 11508 South Central Avenue. The address of the station would be: Alley East of 11508 South Central Avenue, Albuquerque.
- 9. Enter the Property Section Number as shown in the PISL.
- 10. Enter the Pgas ID for all Border Stations and Large Customer Meter Stations that have actual or expected consumption greater than 200,000 therms annually.

### Visual Inspection (B, Exhibit 1)

- 1. Perform the checks indicated.
- 2. Make appropriate remarks for any "Not OK" conditions you find.
- 3. Notify your supervisor of any condition you find and cannot correct.

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## Valves (C, Exhibit 1)

Use this section of the form for all station valves:

- 1. Enter the requested valve data.
- 2. Perform the checks indicated.
- 3. Make sure the pressure ratings fit within the maximum pressures the valves will have to withstand.
- 4. Enter the number of valves in each location on the station in the spaces provided. If the space for "Other" is used, then enter the location on the line provided. The total number or valves should equal the number indicated under "Quant."
- 5. Make appropriate remarks for any "Not OK" condition you find.
- 6. Notify your supervisor of any improper condition you find and cannot correct.

#### Regulators (D, Exhibit 1)

- 1. From equipment name plates, enter the requested data—make, size, type of connection, and pressure rating. Note: The equipment pressure rating must be high enough to withstand the maximum inlet pressure. Notify your supervisor if the pressure rating is lower than the maximum inlet pressure.
- 2. Determine and enter the maximum and minimum inlet pressures; the intermediate pressure (for working monitor applications) and the outlet set pressures; Enter the Maximum Allowable Operating Pressure for both the upstream system and the downstream system. If the outlet pressure can get higher than the MAOP downstream, determine that proper safety devices are used.
- 3. Indicate whether or not an internal inspection is to be performed. If so, open regulator(s) and check the size and condition of the inner valves. The inner valves should be the proper size to pass the required maximum capacity of the station (see item i., below). Enter the inner valve size. NOTE: Visual inspection requirements are outlined in Policy M-008. Some regulators may be tested annually for lockup, set point, and flowing characteristics and a visual inspection of the orifice and seats will be performed every three years. Boot type regulators must be internally inspected annually.
- 4. Enter the set pressure as it is when you leave. Indicate if it is "OK" or "Not OK." If "Not OK," explain.
- 5. Enter the requested data for the inlet/outlet emergency shutoff valves. Confirm that the valves have been operated and also lubricated if necessary.

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- 6. Check the position of the diaphragm. If the regulator design will permit it, the diaphragm should be installed in a vertical position above the throat of the regulator, with the vent pointing downward, so that any liquids that collect on either side of the diaphragm will drain off. The condition "OK" or "Not OK" depends on the design of the regulator.
- 7. Check the position of the regulator vent. It must always point downward. If it does not, (1) rotate the top of the diaphragm casing and turn the vent toward the ground, or (2) install an ell in the vent opening so that it is pointing toward the ground.

The vent must never be left in such a position that water can enter it or that it can discharge into a building opening such as a window, door, or gable vent.

- 8. Vary the set points on the pilots and other controls to see if the unit responds. If "Not OK," indicate the action you took to correct this condition. Note: Pilot regulators and control loop over-pressure protection devices must be internally inspected or replaced at least once every five years.
- 9. Indicate that the control lines were checked and that the valves in the control lines are secured in the open position. Indicate that the restrictors upstream of the regulator pilots are set properly.
- 10. From the manufacturer's specification sheets, determine the capacity of the regulator in cubic feet per hour based upon both of the following:
  - a. The inner valve size (see item 3, above).
  - b. The maximum, minimum, and MAOP pressures (see item 2, above).

Enter regulator capacity. If this capacity is not within the maximum/minimum capacity requirements of the station, indicate the action you took or the action you will take to correct this condition.

- 11. Enter the Maximum Hourly Load on the station. Insure that the regulator capacities will meet this demand.
- 12. Make appropriate remarks for any "Not OK" blanks checked.
- 13. List any other improper condition you find and indicate the action you took. Notify your supervisor of any improper condition you find and cannot correct.

#### Relief Valves and Shut-Off Devices (E, Exhibit 1)

#### **Relief Valves**

1. From equipment name plate(s), enter the requested data. Indicate whether the device is an OPSO or a Relief Valve and whether the device is internal to the

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regulator. Also indicate if the device is a "Token Relief". Note: The equipment pressure rating must be high enough to withstand the maximum pressure that it will be subjected to. If not, the device must be replaced with one that has an adequate pressure rating. Notify your supervisor for corrective action.

- 2. Enter the inner valve size. The inner valve size must be adequate to relieve all the gas the regulator can pass at maximum inlet pressure and maximum safe downstream pressure. (See item 7 below for relief valve capacity.)
- 3. Determine that the relief valve itself is in a safe location and has proper protection around it.

Report to your supervisor for corrective action if: (1) The relief valve take-off is not located immediately downstream of the regulator or other proper location. (2) There is any equipment installed between the regulator and the relief valve (this may be proper in some cases).

If the relief is in a remote location, enter its distance from the station. If it is installed directly on the station, enter a zero (0).

- 4. The stack should be located so that gas discharged from it will not create a hazardous condition. Determine that the relief stack is free of and protected against obstructions. It should be fitted with a counter-balanced flapper cap or other proper cover to prevent liquids and dirt from entering it.
- 5. Determine the proper set point pressure for the relief valve(s). This is the pressure at which the relief valve will begin to open in case of excessive pressure build-up. You must test the relief valve for proper operation. All relief valve settings shall be equipped with test connections for this purpose. If not, you must use some other means to actually test the set point Isolate the relief valve(s) from the rest of the system and increase the pressure to it to cause it to open. The device should begin to open at the set pressure, and in any case, at no more that one-half pound above the set pressure. Depending upon the type of equipment used, the set pressure is an arbitrary pressure above the regulator's usual serving pressure. Indicate whether or not the device actuated at the set pressure. Make corrections or adjustments as necessary.
- 6. The relief valve thust be capable of passing all the gas that the regulator can pass at maximum pressure conditions without over-pressuring the downstream piping or the customer's equipment in case of failure of the regulator. Calculate the capacity that each relief valve will pass based upon: (a) The maximum regulator inlet pressure; (b) the maximum safe downstream pressure, and (c) the inner valve size. Enter this capacity.

**Note:** You may calculate the relief valve capacity in the office if relief valve capacity specification sheets are not available for on-site use. However, if you find that the

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relief valve capacity is inadequate, you must take action immediately to correct the situation.

- 7. Make appropriate remarks for any "Not OK" blocks checked. List in the "Remarks" section any improper conditions you found and indicate the action you took.
- 8. Notify your supervisor of any improper condition you find that you cannot correct.

#### **Shut-Off Devices**

9. From the equipment name plate, enter the requested data. Indicate whether the device is an OPSO or a Relief Valve and whether the device is internal to the regulator.

Note: The pressure rating must be high enough to withstand the maximum pressure to which it will ever be subjected. If not, it must be replaced with a device that has an adequate pressure rating. Notify your supervisor for corrective action.

- 10. Determine that the shut-off device is in the proper place in the setting. The shut-off device should be immediately upstream of the pressure control device and have a control line piped to a tap that is downstream of the pressure control device.
- 11. Determine that a loss of service would not be critical if the device shuts off the gas flow.
- 12. Test the device. Pressure it to the point that it actually shuts off. The device should actuate at the set pressure, and in any case, at no more that one-half pound above the set pressure. Make corrections or adjustments as necessary.
- 13. Report to your supervisor the need for removal of this device if a loss of service is critical or for moving the device if it is improperly located.
- 14. Make appropriate remarks for any other improper conditions you find and cannot correct and report them to your supervisor.

#### Filter / Strainer (F, Exhibit 1)

- 1. From equipment name plates, enter the requested data. Make sure the pressure ratings fit within the maximum pressure the unit will have to withstand. Indicate whether the device is a filter or a strainer.
- 2. Check the filter cartridges or screens for indication of excessive differential pressure. Replace the filter cartridges or clean the screens, as necessary.
- 3. Check for leaks. Repair any you find or make sure they are repaired, as necessary.

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- 4. List any improper condition you find and indicate the action you took. Make appropriate remarks for any "Not OK" blanks you checked.
- 5. Notify your supervisor of any improper condition you find and cannot correct.

### Other Equipment (G, Exhibit 1)

- 1. From equipment name plates, enter the requested data. Make sure the pressure ratings fit within the maximum pressure the unit will have to withstand. Record in this section any over-pressure protection devices installed in the control piping loop.
- 2. Check all controls (actually operate them).
- 3. Check any pits or tanks for adequate capacity and safety conditions.
- 4. Check any flash arresters. The screen should be properly fitted and free of holes.
- 5. List the Meter and/or Instrument make, size, and serial number.
- 6. Check for leaks. Repair any you find or make sure they are repaired, as necessary.
- 7. Indicate the condition of the vault or pit. Indicate the condition of the lid. If the vault or lid is defective or unsatisfactory, make a notation of required repairs in the remarks section.
- 8. List any improper condition you find and indicate the action you took. Make appropriate remarks for any "Not OK" blanks you checked.
- 9. Notify your supervisor of any improper condition you find and cannot correct.

#### Remarks (H, Exhibit 1)

- 1. Enter any other remark you feel would be helpful to determine that the station equipment is adequate for the required conditions. Properly reference any remark you make to its respective equipment.
- 2. If you need more space for remarks: (1) Use the reverse side of the form, or take a blank form and fill in the identification section. (2) Write across the face of the form "See other side." (3) Enter remarks on the back side of the blank form. (See the example on the following page.)

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#### Final Check

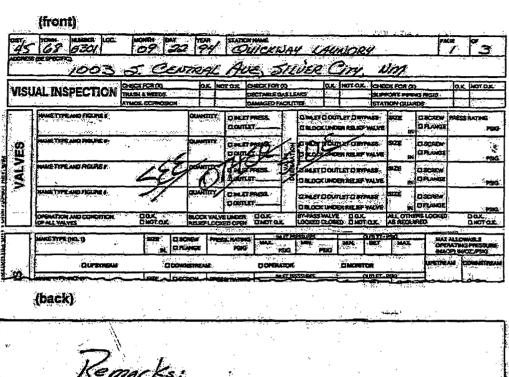
- 1. Re-check all valves in the station.
- 2. Determine that they have been checked for operation, cracks, leaks, etc. All valves must have been operated as part of the inspection, and lubricated if necessary, to determine that they are functioning properly.
- 3. Determine that the block valve under the relief valve is locked in the *open* position.
- 4. Determine that all bypass valves are locked in the *closed* position.
- 5. Determine that blow-down valves are in the *closed* position.
- 6. Determine that all other valves are locked and/or secured as required.
- 7. Determine that all manifold valves on transducers are in the proper position.
- 8. Determine that all caps, lids, plugs, and blinds on pressure taps, regulators, pilots, reliefs, OPSO's, test-tees etc. have been replaced and tightened.

### Signature and Date (I, Exhibit 1)

In the block provided at the bottom of the form, enter your signature and the date on which you made the inspection. The Supervisor reviewing the report must sign (or initial) and date the form in the "Remarks" section and list action taken on any items out of compliance. A copy of the completed inspection report must be forwarded to the Measurement Department in Gas Engineering Services.

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# Example of Entry of Remarks on Reverse Side of Form



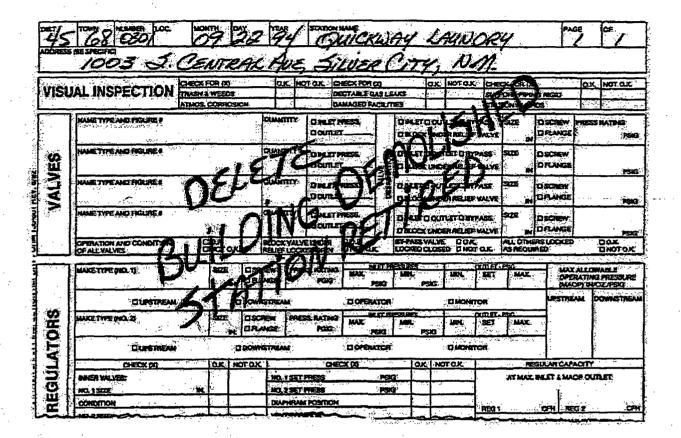
Remarks:

L. Corrected vent position
on Fisher #621 regulator.

2- Relief values need to be
moved to a remote
location.

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## Example of Entry to Remove Station from Computer Listing



#### Station Removal

If a station is removed:

- 1. Complete the top line of an inspection form.
- 2. Write the word "Delete" across the face of the form and give the reason (retirement of the station, modification to the extent that it no longer requires inspection, cancellation of a duplicating station number, etc.).
- 3. Complete any other forms required to retire the station property. (Refer to Procedure CA-P01, Plant Retirement.)

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# Schedule I District and Commercial Office Codes

	District	1	Commercial Office
	Code	Code	Name
Southwest New Mexico District	45	52	Alamogordo
	45	66	Anthony
Γ	45	68	Silver City 📡
·	45	51	Truth or Consequences
Central New Mexico District	55	26	Albuquerque
	55	30	Belen
Eastern New Mexico District	65	42	Artesia
	65	44	Carlsbad
<b> </b>	. 65	23	Clayton
	65	16	Clovis
T T	65	50	Lovington
	65	18	Portales
	65	49	Roswell
\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	65	22	Tucumcari
Northwest New Mexico District	70	33	Chama
	70	34	Espanola
V. T	70	36	Farmington
Γ	70	38	Gallup
· · · · · · · · · · · · · · · · · · ·	70	37	Grants
<b>_</b>	70	40	Santa Fe
· /	70	32	Taos
Transmission	01	36	North Central
	01	40	Central
	02	00	Permian



## C&M ◆ Procedure

## Operations/Maintenance—Valves

Issued	Revised		Number
09/27/96	03/24/00		CM-P11
Responsible Department		Affected Locations	
Construction and Maintenance		All Ga	s Company Locations

## Purpose

Each operating location must inspect and perform necessary maintenance on all valves that are installed in the system to permit sectionalizing or emergency shutoff. We must examine each valve at least once each calendar year and at intervals not exceeding 15 months.

## Maintenance Program

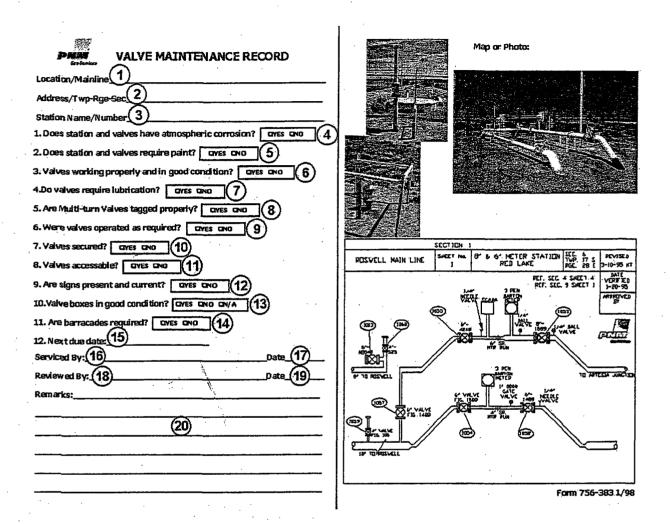
We must keep a record of all valve inspections by each location. Required inspections must include the following information and information can be recorded on Company Form (756-383 1/98) Valve maintenance Record (See Figure 1 of this procedure):

- 1. Document the Location or Mainline where valves are located.
- 2. Document the Address or Township-Range-Section information where valves are located.
- 3. Document the Station Name and/or Number.
- 4. Complete a visual inspection, where possible, for signs of atmospheric corrosion or damage. Check the YES box if there is atmospheric corrosion and NO if there isn't. Document the details to the extent of corrosion damage, extent of damage to the valve, etc., in the Remarks Section.
- 5. Complete a visual inspection of the paint on the valve. Ensure all valves both above ground and below ground have the proper paint applied. Check YES box if the station and/or valves require paint or the NO box if they do not. If you check NO give details in the Remarks Section.
- 6. Complete an operation check to make sure that the valve turns freely and functions properly. Complete a leak check of bonnets, glands, flanges and other bolted or screwed parts. Complete a visual inspection of the support system (if present) to be sure valve is properly supported. Tighten and/or repair all loose or improper support found. Check the YES box if valves are working properly, there are no leaks left, valve support is good and valves are in good condition or check NO if they are not. If you check NO give details in the Remarks Section.
- 7. Lubricate valves as required. Complete all other maintenance requirements to the valves. Check YES box if valves were lubricated or check NO if not.

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Construction and Mair	Construction and Maintenance		s Company Locations

- 8. If a valve (other than plug) requires more than a quarter turn to operate (Multi-turn valve) make sure they are properly tagged. Check the YES box if it is tagged or NO if it isn't.
- 9. Exercise valves as required. Check YES if valves were exercised and NO if not. If a valve is not exercised explain why it wasn't in the Remarks Section.
- 10. Are all valves secured? Check YES box if they are or NO box if not. Valves must be inside a locked fence, locked valve box or have some type of locking device on the valve. If NO is check document information in the Remarks Section and show date when valves were secured in the follow-up.
- 11. Are valves accessible? Check YES box if they are not or NO box if not. If NO is checked document information in the Remarks Section and show date when follow-up work was completed to make the valve accessible.
- 12. Are signs present and current? Make sure a current company sign with a current Emergency Phone Number and the current Call Before You Dig Phone Number on the sign is present. Check YES box if a current sign is there or NO if not. If NO box is checked show date when follow-up was completed to replace sign.
- 13. Valve boxes in good condition? Check valve boxes to see if there is proper alignment on the valve, the valve box is in good condition and clean valve box is necessary. Check YES box if the valve box meets these conditions and NO if not. If NO is checked give details in the Remarks section and document the date the box was repaired, realigned and/or cleaned.
- 14. Are barricades required? If yes, check the YES box if no check the NO box. If barricades are required document information in the Remarks Section and follow-up to show date when barricades were provided.
- 15. Show the next date maintenance will be due.
- 16. Serviced By: Document the name of the person who serviced the valves.
- 17. Show the date when the valves were serviced.
- 18. Reviewed By: Document the name of the supervisor or the designated person who reviews the Valve Maintenance Records after the record has been reviewed.
- 19. Show the date the Valve Maintenance Record was reviewed.
- 20. Remarks: Any pertinent information can be document in this section.

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## Records

We must keep a record of all valve inspections by each location. Make the record either an inspection record that lists the valves examined at a particular time or a valve record that indicates the inspections for each valve. We require no other information.

## Related Policies and Procedures

None

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## Engineering/Design → Procedure

## Emergency Plan Maintenance

Issued	Revised	· .	Number
05/08/81	06/0	2/98	ED-P05
Responsible Department		Affected Locations	
Engineering		All G	as Service Locations

## **Purpose**

To establish a method of conducting simulations to test the effectiveness of training that operating personnel have received in handling emergencies (see Policy ED-012, Emergencies, Interruptions, Curtailments). Our Company conducts simulated emergencies and evaluates personnel performance during them to determine our emergency readiness and the effectiveness of our training efforts.

## **Testing of Training**

Management (at any level) or the Human Resources Department may originate testing when supervisory personnel consider such action justified. A sufficient number of supervisory personnel should administer the test to attain as much realism as possible. The test administrators should completely understand the operations being tested and the test procedure. The timing of the test, the location, participating personnel, and contributing factors must all be predetermined and coordinated effectively.

You must forewarn all participants that this is only a test in a simulated situation. Failure to make this clear can result in unnecessary hazards for both the employees affected and the general public.

We have developed a test procedure for the simulation and evaluation of handling a leak. Exhibit A of this procedure contains a sketch of the general characteristics of a simulated leak situation. Exhibits B through D contain checklists you can use to record the steps taken during the simulation. We have arranged these checklists in a step-by-step sequence to reflect actual operating procedures.

You may duplicate copies of the sketch and checklists as required from this procedure. You may use these forms to train employees, to conduct leak simulations, or to review actual performance during emergencies.

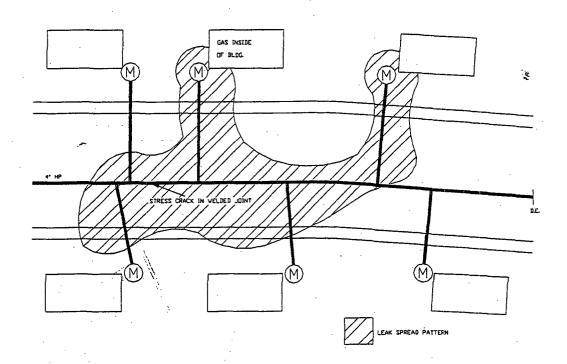
In each performance test, the evaluator collects the checklists, evaluates the performance, and submits a writter report to management at the local and Area levels and to Gas Engineering. Action will be taken to correct any weaknesses disclosed during the simulations.

## Related Policies and Procedures

Policy ED-012 (Emergencies, Interruptions, Curtailments)

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Exhibit A Sketch of Suggested Simulated Leak Site



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# Exhibit B Checklist A -- Evaluator's Checklist

Location	Date	Evaluator
☐ Fill out the top of this checklist. I	Enter an "X" as you complete each	step.
☐ Arrange with the location for a te	st and supply the necessary checkli	ists.
☐ Complete test data for the dispat	cher, the service technician, and Ca	&M personnel involved.*
☐ Visit the test site and assure that	all is ready for the test.	
☐ Report the following to a Compa	ny service clerk or dispatcher:	
☐ This is a simulated emergency. ☐ Name of evaluator (caller). ☐ Address of emergency site. ☐ Telephone number of evaluator. ☐ Nature of public or customer com ☐ Type of structure or area involved. ☐ Type and nature of emergency. ☐ Detailed identification of the eme ☐ Evaluator's estimate of severity of ☐ Estimated amount of time problet. ☐ Names of other people or agenci. ☐ Traffic situation.	d. rgency site. f situation. n has existed.	
☐ Call the 24-hour Pipeline Inciden	t Hotline.	
☐ Notify police, fire, etc., as require	d.	
☐ Initiate log of events.		
☐ Contact the employee at the site	who responds to the call and do the	e following:
☐ Provide any necessary instructions☐ Observe the employee's procedure☐ Check or test the employee's equi☐ Discuss the investigation, findings.	э.	ployee.

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# Exhibit B Checklist A -- Evaluator's Checklist (Continued)

☐ Contact any C&M foreman called to assist at the site and do the following:
☐ Provide any necessary instructions.
Permit the service technician to provide C&M foreman with a report of the investigation and all the simulated details.
☐ Instruct the C&M foreman to proceed with the investigation (except for excavating) as if this were an actual situation.
☐ Inspect with the C&M foreman the equipment that would have been used under the circumstances if this were an actual leak.
☐ Discuss with the C&M foreman the actions taken and recommended.
☐ Collect all checklists.
Prepare a written report.

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## Exhibit C Checklist B - Evaluator's Checklist

Location	Date	Prepared by
☐ Receive a "service call" for a sim	ulated leak.	·
☐ Fill out the top of this checklist.	Enter an "X" as you complete each	step.
Record the following on an Emer	gency Service Request Order:	· · · · · · · · · · · · · · · · · · ·
□ Date. □ Time. □ Name of the caller. □ This is a simulated emergency. □ Address of the emergency site. □ Telephone number of the caller. □ Name of the customer or public of the customer or public of the customer or public of the emergence of the emergence of the emergence of the emergence of the emergence of the severity of the emergence of the severity of the emergence of the severity of the emergence of the severity of the emergence of the severity of the emergence of the severity of the emergence of the severity of the emergence of the severity of the emergence of the severity of the emergence of the severity of the emergence of the severity of the emergence of the severity of the emergence of the emergence of the emergence of the emergence of the emergency.	d. cy. gency site. f the situation. existed.	
☐ Evaluate the situation as major o	r minor.	
☐ Notify the appropriate supervisor,	, if indicated.	
☐ Dispatch the call.		•
☐ Record the dispatch time.☐ Record the name of the service to	echnician.	
☐ Enter the order on the Leak Inves	stigation Log.	
Record the completed order on the test "	ne Leak Investigation Log and the s	services performed as a "simulation

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# Exhibit D Checklist C - Service Technician's Checklist

Location	Date		Service Technician
☐ Receive a "service call" for	a simulated leak.		
☐ Fill out the top of this check	ist.		
Record the following on a L Date. Time. This is a simulated emerger Name of the caller. Address of the emergency of the caller. Telephone number of the caller. Name of the customer or put your name or initials. Type and nature of emerger Detailed identification of the Estimate of the seriousness Estimated time the problem Dispatcher's evaluation as to Names of other people or as Traffic situation.	ncy.  aller.  ablic contact at the emancy.  emergency site.  of the situation.  has existed.  o the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousness of the seriousn	nergency site.	
Go to the emergency site ar Record your arrival time. Contact the evaluator for sir Confirm the presence of gas Determine the percentage Decide whether evacuati Complete evacuation, if Call for help, if needed. Perform the standard leak in Clock test the meter. Make necessary repairs	nulated data and any sodor. ye of gas inside the buon is needed. needed.	uilding.	•

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# Exhibit D Checklist C - Service Technician's Checklist (continued)

	Soap test the meter connections, if needed.	
	Make necessary repairs.	
	Sar test in appropriate locations.	
, 🚨 li	nvestigate adjacent buildings.	
□ T	ake any action indicated.	
Ę	Repair or cut off.	
(	☐ Call for help.	
[	Continue bar testing.	
	lote arrival time of C&M crew.	
☐ Rep	ort your findings and actions to the evaluator.	
☐ Subi	nit the equipment to the evaluator for inspection and testing.	
☐ If the Care	e simulated leak was upstream of the customer's meter and you repaired it or cut it off, note on the Leal i.	k
☐ Com	plete your Service Order and turn it in, in accordance with standard procedure.	
☐ Rep	ort to your dispatcher or supervisor when the assignment is completed.	

Issued	Revised		Number
05/08/81	06/0	2/98	ED-P05
Responsible Department		Affected Locations	
Engineering		All Ga	s Company Locations

## Exhibit E Checklist D - C&M Foreman's Checklist

Location	Date	<b>.</b>	Prepared by
☐ Receive a "service call" from a di	spatcher or service t	echnician for a	simulated leak.
☐ Fill out the top of this checklist.			્
☐ Record the following on a Leak F	Report:		
□ Date. □ Time. □ This is a simulated emergency. □ Address of the emergency site. □ Detailed identification of the emer □ Name of the person to be contact □ Type and nature of the emergence	ed at the site (the evaluy.	uator).	
☐ Record your arrival time.			
☐ Contact the evaluator for simulate			
Contact the service technician if the		-	
Perform such functions (short of e	excavation) that you wo	uld perform in a	n actual leak situation.
☐ Continue bar testing, if indicated.			
Determine the point where any ex	,		
Determine what work would be do	•	ictual situation.	
Determine what work would be do			I will a seed to a dominate for the
With the evaluator, inspect your e purpose outlined.	quipment and determin	e that it is in go	od condition and is adequate for the
☐ Complete your Leak Report.	:		
☐ Report to your dispatcher or supe	rvisor when the assign	ment is complete	ed.



## Engineering/Design ◆ Policy

## Emergencies, Interruptions, Curtailments

Issued	Revised	Number
04/01/71	07/05/99	ED-012

#### General

Sometimes unusual conditions develop that can affect gas system operations. The effect that these conditions have on operations may depend on how well the operating location has planned for such conditions before they occur. It is important that, when unusual conditions do occur, the operating location react as quickly as possible to limit the effect of the incident. The operating location also needs to repair and restore affected operations as soon as practical.

#### Related Policies and Procedures

Policy AP-028 (Reporting System Emergencies, Curtailments, and Interruptions) Policy ED-013 (Regulatory Reporting)

## Emergencies

"Emergency" is defined as a situation that is potentially hazardous to life or property. Each operating location must prepare a written emergency plan that establishes procedures to minimize these hazards. We are required to include each operating location emergency plan in our Company's overall "Operating and Maintenance Plan."

Each emergency plan must address, but is not limited to, the following emergencies:

- 1. Impending known hazard.
- 2. Gas detected inside or near a building.
- 3. Hazardous leak.
- 4. Damage to facilities.
- 5. Fire or explosion near or directly involving a pipeline facility.
- 6. Uncontrolled flow of gas.
- 7. Abnormal weather.
- 8. Outage (an unplanned loss of service).
- 9. Disaster (natural disasters, enemy attacks, serious civil disorders, etc.).

### **Emergency Procedures**

Each operating location must incorporate procedures for gas outages, explosions, and disasters as part of the emergency plan. The emergency plan must encompass system

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sectionalizing programs, a written isolation plan, and the use of all emergency valves. In addition, the plan must include procedures for the following:

- 1. Receiving, identifying, and classifying notices of events that require immediate response.
- 2. Establishing and maintaining adequate communication with appropriate fire, police, and other public officials.
- 3. Promptly and effectively responding to a notice of each type of emergency.
- 4. Making personnel, equipment, tools, and materials available, as needed, at the scene of the emergency.
- 5. Taking direct action to protect people first and then property.
- 6. Providing emergency shut-down and pressure reduction in any section of the pipeline system necessary to minimize hazards to life or property.
- 7. Making safe an actual or potential hazard to life or property.
- 8. Notifying appropriate fire, police, and other public officials of gas pipeline emergencies and coordinating with them both planned responses and actual responses during an emergency.
- 9. Safely restoring a service outage.
- 10. Investigating and analyzing all accidents and failures, where appropriate, to determine their causes and to minimize their possible recurrence.
- 11. Incident reporting as required by federal regulations.

## **Operating Location's Specific Emergency Plan Maintenance**

Each operating location must do the following:

- 1. Furnish a copy of the emergency plan to supervisors who are responsible for emergency action in that location.
- 2. Train the appropriate operating personnel about emergency procedures and verify that the training is effective. Conduct this training at least twice annually, preferably at six-month intervals. An agenda showing the emergency, procedures covered with the employees, and the date and signatures of employees must be available to show DOT inspectors.
- 3. Review employee activities after an emergency to determine whether the procedures were effective.

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#### **Operating Location Liaison**

Each operating location establishes and maintains liaison with appropriate fire, police, and other public officials to accomplish the following:

- 1. Learn the responsibility and resources of each government organization that may provide assistance during an emergency.
- Acquaint officials with our Company's ability to respond to an emergency. Conduct
  meetings once annually. An agenda showing the meetings with public officials and
  the date and signatures of the people involved must be available to show DOT
  inspectors.
- 3. Identify the types of gas pipeline emergencies which the operating location reports to the officials.
- 4. Plan how the operator and officials can work together to minimize hazards to life or property.

## **Education Program**

Our Company must conduct a continuing education program that informs customers, the public, appropriate government organizations, and persons engaged in excavation-related activities how to recognize a gas pipeline emergency and report it to us. The program must be conducted in both English and Spanish. In New Mexico, we have a significant number of Spanish speaking people in all the locations we serve. This program will be accomplished by using one or more of the following: News Paper Ads, Radio Ads, TV Ads, or Bill Stuffers.

### Records

In addition to the written emergency plan, each operating location must keep sufficient records to ensure that all parts of this policy are followed. This record includes dates of training sessions, lists of attendants, and agendas of the training provided.

## **Electrical Power Outages**

During an electrical power outage in a town, most of the heating load goes off because the electrically powered fans, thermostats, and controls stop working. If this occurs during cold weather and the outage is both very general and sustained for a reasonable period of time, all the thermostats will call for gas at one time when power is restored. This causes a peak load for a few minutes that is much bigger than the system can handle. This "extra" load does not last long — possibly only about 15 to 20 minutes — but it may be enough to drain the system and cause low pressure outages in various parts of town. There are steps that you can take to minimize these low pressure outages. Before the electricity is restored, do the following:



## AP&R ◆ Policy

## Excavation of Contaminated Soil

Issued	Revised	Number
09/01/98		AP-030

#### General

During any excavation activity, toxic chemical or hazardous materials may be encountered in soil or ground water. In the pursuit of worker, public safety, and environmental concerns the following work procedure should be used when contaminated soil is encountered.

### Related Policies and Procedures

Policy ED-013 (Regulatory Reporting)

Policy AP-003, (Personal Protective Equipment)

Policy AP-027 (Excavation)

#### Contamination

#### Soil

Soil Contamination may include, but is not limited to:

- asbestos containing material
- solvents, paints, etc.
- liquid fuels (i.e. gasoline, diesel, etc.)
- sewage
- transformer / capacitor dielectric fluids (if working near electrical equipment)

### Signs

- discolored soil
- unnatural soil or water odor
- a sheen on water surface
- skin irritation upon contact with soil

#### Exposure

Exposure concerns may include, but are not limited to:

- skin contact with toxic or hazardous chemicals and materials
- inhalation of toxic or hazards chemicals and materials
- combustible and / or flammable atmospheres

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09/01/98		AP-030

- the spread of contamination into the groundwater
- the spread of contamination to local vegetation (edible and non-edible).

#### **General Work Procedures**

When contamination is encountered or suspected the following steps should be taken:

- notify Environmental Services (see below)
- limit worker exposure
- utilize appropriate personal protective equipment (gloves, coveralls, rubber over shoes, and protective eye wear) when exposed to known and unknown hazards
- identify the contaminant as best as possible, via customers, construction contractors, New Mexico State Highway and Transportation Department, supervision, PNM Environmental Services, etc.
- identify atmospheric conditions, combustible / flammable, oxygen deficient, etc.
- limit inhalation exposure through the use of an appropriate respirator, or mechanical ventilators
- limit exposure through mechanical barriers (i.e. plastic sheeting, trench shields, etc.)

**Note**: Personal hygiene precautions must be utilized when exposed to raw sewage, and may warrant a Blood Borne Pathogens medical assessment.

#### Contacts

For specific case by case guidelines or further general information contact Environmental Services and/or Loss Control

NOTE: After Hours and Weekends: Contact available through Gas or Electric Dispatchers, or Environmental Services pager at 790-7335.

#### When to contact Environmental Services:

- 1. Information is obtained regarding known contamination.
- Contamination is discovered Newly discovered spills or releases to the environment (soil, water, air) must be reported to the New Mexico Environment Department within 24 hours. NOTE: reporting will be conducted by Environmental Services' staff.

#### What Environmental Services will do:

- 1. Contact the New Mexico Environment Department within 24 hours after being notified of a discovered spill or contamination.
- 2. File spill and corrective action reports to regulatory agencies as necessary.

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- 3. Review existing investigation reports or site conditions to assess the magnitude of any possible exposure.
- 4. Sample and profile contaminated soil.
- 5. Arrange for the disposition of contaminated soil (remediation, storage, or disposal) as necessary.
- 6. Provide personnel with information on work procedures necessary.

Warning: If operation groups trench into contaminated soil, they may become the generator of a hazardous waste with the responsibility of paying for proper disposal, adding to the cost of doing the job.

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Issued	Revised	Number
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09/01/98		AP-030
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## AP&R → Procedure

## Hazard Communication Program

Issued	Revised		Number
06/24/88	06/0	12/98	AP-P01
Responsible Department		Affected Locations	
Human Resour	ces	All	Company Locations

## Purpose

To establish standard practices under our Hazard Communication Program to comply with OSHA regulations. The objective of this program is to provide a safer working environment for all Company employees.

#### General Overview

#### Introduction

Our Company's Hazard Communication Program is based on OSHA regulations. The program is intended to inform employees about chemical hazards in the workplace.

OSHA's standards require our Company to provide the following:

- Written procedures.
- Employee training.
- Chemical information collection.
- Container labeling.
- Contractor notification and other actions to our employees.

### Written Program

OSHA requires our Company to develop a written program describing how we manage our Hazard Communication Program.

Copies of this written program are available upon request to all employees, OSHA representatives, and NIOSH representatives. This procedure encompasses our written program.

## **Employee Information and Training**

#### General

The key objective of the Hazard Communication Program is to train employees in working with hazardous substances. This program requires the following:

 All employees who work around hazardous chemicals are required to attend an initial training covering the following topics:

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06/24/88	06/0	2/98	AP-P01
Responsible Department		Affected Locations	
Human Resource	es	All (	Company Locations

- Our Hazard Communication Program and written program.
- How to read Material Safety Data Sheets (MSDSs).
- Other basic information about chemical hazards in the workplace.

The Human Resources (HR) Department provides initial training to all supervisors who are responsible for training all affected employees. After attending their training, supervisors are responsible for the initial training of all employees under their supervision. Upon request, HR will provide assistance to supervisors on the initial training of employees.

- 2. Training and information is given to employees by supervisors on the hazards of nonroutine jobs involving hazardous chemicals. This type of training is an ongoing process.
- 3. Training is given to employees by supervisors whenever a new hazard is introduced to an area or whenever an employee is transferred into an area where hazardous chemicals are present.
- 4. An annual review/retraining is conducted with all employees covering every chemical on the inventory list for their work location.

#### **Outcome of Training**

After attending training sessions, employees will know the following.

- 1. Where our Company's written program, chemical lists, and MSDSs are located.
- 2. How to read and understand an MSDS.
- 3. The chemical hazards in their workplace.
- 4. How and where to acquire additional information about the chemicals used in their workplace.

Additional information requested by employees about the program is provided by their supervisors or by HR.

### Location of Information

Each identified location with hazardous chemicals is provided with MSDSs and chemical lists to inform employees about hazardous chemicals in their workplace. This information is to be contained in the location's Hazardous Materials Handbook. Employees are notified where the handbooks are located in their vicinity.



## AP&R ♦ Policy

## Handling Materials

Issued	Revised	Number
03/08/74	06/02/98	AP-007

#### General

When moving material, use appropriate handling devices or equipment. Follow safe lifting and handling practices. Do not attempt to handle objects that are so heavy or awkward that it may injure you. Use mechanical devices whenever possible to lift, lower, or move heavy objects. When lifting equipment or when handling rough objects, wear approved work gloves and safety shoes.

Maintain safe clearance from all elevated loads. Never stand or travel under suspended loads.

#### Related Policies and Procedures

Policy AP-003 (Personal Protective Equipment)

## Preventing Personal Injury

When two or more employees are working together on the same job, each must know what the other intends to do. Discuss the job before doing the work.

#### **Preventing Back Injuries**

Most back injuries occur while lifting materials. Use proper body posture. Good posture is very important in avoiding back pain. Remember the following important facts about protecting your back in any activity, whether on the job or at home:

- 1. Keep your back as straight as possible. Do not bend straight over, turn, or twist to pick up something, even if it is a light object.
- 2. Bend your knees.
- 3. Lift with your legs.
- 4. Never keep both feet squared. Place one foot slightly in front of the other to give yourself better stability.
- 5. Never lift or carry anything heavier than you can manage with ease.
- 6. Try to avoid slouching or bending forward when sitting or driving.

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03/08/74	06/02/98	AP-007

#### **Handling Heavy Objects**

Never try to handle heavy objects alone. *Get help!* Grasp all objects firmly. Keep all sides clear to avoid damaging your fingers. Always store heavy items on the lowest shelves possible. No item should extend past the shelf because it reduces aisle clearance or creates an obstruction.

Whenever possible, use portable cranes, hand trucks, skids, or hoists whenever possible for moving heavy objects. Wear work gloves and safety shoes when handling heavy or rough objects. When moving materials on hand trucks, push rather than pull them whenever possible.

#### Stacking and Storing Materials

Stack materials neatly so piles will not slip or shift, causing materials to fall. When stacking sharp materials, especially bar stock, the ends should not protrude over the face of the pile. Stack heavy items on the bottom, with lighter items toward the top. Cross-tie bags or cartons of material where possible to increase stability.

When storing round objects above the floor, block or otherwise anchor them so they will not slip, roll, or fall. Store tools with points or cutting edges in a downward direction where possible.

Store flammable material such as paint, thinners, alcohol, etc. in one central area. Make sure to store them in approved areas or approved fire resistant metal cabinets, reference NFPA 101, Life Safety Code.

#### **Using Hoisting Equipment**

Frequently inspect all hoisting equipment, such as come-alongs, chain falls, meter strapping equipment, wire ropes, and other lifting types of tools. Keep a record of the inspection in the primary users issue or storage area.

Repair or replace all defective hoisting equipment. Tag discarded items to make sure no one will use them.

Do not stand under loads that are suspended by ropes, chains, or cables. Stand clear or rigging ropes, cables, and chains under tension. Keep the area clear directly beneath any raised load. Do not walk under any kind of load held by a hoist unless the operator safely blocks the load or uses a double safety device (i.e., a hydraulic floor lift, safety bar). Straps, chokers, and slings are preferred.

### Using Material-handling Power Equipment

When using power equipment to raise or lower materials, have one person who is in clear view of the operator give hand signals. Secure materials you are moving so they do not damage the vehicles. Take care to ensure that items do not fall from the vehicles or otherwise endanger the public.

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#### Clearances

Where mechanical handling equipment is used, allow sufficient safe clearance for aisles, at loading docks, through doorways, and wherever turns or travel must be made. Keep aisles and passageways clear, in good repair, and free of hazardous obstruction. Where permanent aisles and passageways exist, mark them appropriately. Our Company provides and permanently displays signs to warn of clearance limits.

#### **Handling Packaging Materials**

When cutting wire or metal strappings from packages, cases, etc., stand where flying ends cannot strike you and warn others nearby. When using boxes to deliver materials to other locations, remove all loose staples, nails, wires, etc.

#### **Toxic Materials**

Use common sense and care when working with toxic or potentially toxic materials. Many items common to everyday life are toxic if improperly used or if an accident to occurs. Examples of this include lighter fluid, sprays, paints, etc. It is almost impossible list the hazardous characteristics of every substance so use care when you are working with any toxic material.

The following list is helpful when working with toxic materials:

- 1. Use any prescribed personal protective equipment when using any material that can cause injury, such as skin irritations, burns, eye injury, or inhalation exposure.
- 2. If toxic material gets into your eyes, wash them with a first aid eye wash or with clean, cold water. Immediately contact local emergency medical facilities and follow their instructions.
- 3. Thoroughly wash exposed areas of skin with soap and water.
- 4. Become thoroughly familiar with any toxic substance you plan to use. Read and follow the instruction label and any warning or caution notice provided.
- 5. Look over the proper Material Safety Data Sheet (MSDS) before using any toxic materials.
- 6. Use good housekeeping and sanitary practices for storing, transporting, and using any toxic material.
- 7. If an accidental exposure to any toxic material occurs that could produce harmful results, immediately tell your supervisor. Seek any medical attention required.
- 8. When using any toxic material, always make sure you have good ventilation. Also make sure you have a way to get to fresh air if you are in an enclosed area.
- 9. If you are in doubt about handling any toxic material, ask your supervisor.

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#### **Material Protection**

Handle, transport, and store all pipe, other material, and equipment with care to prevent damage. Coated pipe must be handled in such a manner as to prevent damage to the coating. The use of chains, tongs, and other narrow or unpadded calipers with coated pipe is prohibited.

#### Powered Industrial Trucks

#### **Use of Powered Equipment**

Post the rated capacity of lift trucks, stackers, etc., on the vehicle so that it is clearly visible to the operator.

- 1. Make no modifications or additions that affect the capacity or safe operation of the equipment without the manufacturer's written approval.
- 2. If a load is lifted by two or more trucks in unison, do not exceed any one trucks' rated capacity with the proportional amount of material being lifted.
- 3. Maintain all truck nameplates and markings in a legible condition.

Check all power-operated industrial trucks prior to use to ensure safe operation. Use a documented checklist when doing so. Ensure all defects involving safe operation are corrected before placing the truck in service. This requirement also applies to other installed equipment on trucks (i.e., lights, horns, fire extinguishers, signals) where such equipment is necessary. If any defect occurs while the truck is in operation and the defect renders the truck unsafe, remove the truck from service until it is repaired. Ensure that all replacement parts for powered industrial trucks are equivalent in safety with those used in the original design. Use installed seat belts and restraint systems when the vehicle is in operation.

- 4. Do not attach steering or spinner knobs to the steering wheel unless the steering mechanism is of a type that isolates road shocks from the steering wheel.
- 5. Ensure that the power switch key is removed from electrically driven lift trucks or the ungrounded battery cable is disconnected when the truck is in an idle status.

### Use in Hazardous Atmospheres

Do not use power-operated industrial trucks in hazardous atmospheres unless they are approved for such use.

### **Battery Handling and Charging**

Our Company battery charging installations are located in areas designated for that purpose. These facilities are provided for flushing and neutralizing spilled electrolyte, for fire protection, for protecting the charging apparatus from damage, and for adequate

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ventilation of fumes from gassing batteries. Our Company provides neutralizing and water flushing facilities within 10 feet of each battery-charging location.

#### **Changing and Charging Storage Batteries**

- 1. When racks are used for battery storage, ensure the racks are nonconductive. Such racks can be made from, coated with, or covered by nonconductive material.
- 2. Properly position and secure reinstalled batteries in the vehicle.
- 3. A carboy tilter or siphon shall be used for handling electrolyte. When charging batteries, pour acid into water; never pour water into acid.
- 4. Properly position vehicles and apply the brake before charging or changing batteries.
- When charging batteries, keep the vent caps in place to avoid electrolyte spray.Ensure that the vent caps are functioning. Open the battery or compartment cover to dissipate heat.
- 6. Do not smoke in the charging area. Take precautions to prevent open flames, sparks, or electric arcs in battery-charging areas.
- 7. Keep tools and other metallic objects away from the top of uncovered batteries.
- 8. Wear eye protection, rubber gloves, and rubber aprons when handling lead acid batteries.

#### Carbon Monoxide Hazard

Make sure that concentration levels of carbon monoxide gas created by powered industrial truck operations do not exceed acceptable limits.

### **Operator Training**

Only a trained and authorized operator is permitted to operate a powered industrial truck (forklift, etc.). Operator authorizations and certifications must be recorded and maintained locally. Local training programs are provided by the Technical Training Department.

## Cranes, Hoists, and Cable or Chain Lifting Devices

- Conspicuously label the load capacity on all cranes, hoists, and cable or chain lifting device. Never load these devices beyond rated limits.
- 2. Conduct pre-use inspections of each unit to determine the following:
  - a. All controls are properly operating.
  - b. Points of stress do not show excessive wear.

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- c. Lubrication levels are adequate.
- d. All safety devices are operative.
- e. There is no hydraulic or pneumatic leakage.
- f. No cable deformation, separations, corrosion, or wear is apparent.
- g. There are no cracked or stressed hooks and broken safety latches.
- h. Chain conditions, including sheaves and pinions, are normal.
- i. Limit switch function is operational.
- j. Brakes, emergency stop pawls, or locking devices are operational.
- k. Electrical service connections and wiring are intact.
- 3. No less than two wraps of rope shall remain on the rope drum when the hook is in its extreme low position.
- 4. When rope replacement is required, select rope of the same size, grade, and construction as the original rope installation.
- 5. Complete inspection records and reports on a monthly basis on critical items such as winch lines, brakes, hooks, ropes, and chains. Make sure you sign and date these records and reports. Keep records readily available and within the proximity of the equipment to which they apply.
- 6. Make sure that inspectors of hoisting equipment are trained by qualified instructors, such as manufacturers' representatives or our own Technical Training personnel.



## AP&R ♦ Procedure

## Safety Meetings

Issued	Revised		Number
02/06/70	06/0	2/98	AP-P05
Responsible Department		Affected Locations	
Insurance and Claims		All G	as Service Locations

## **Purpose**

To establish the organization and conduct of safety meetings and the reporting of their minutes.

## **Purpose of Meetings**

Safety meetings provide opportunities for the various levels of management to communicate with employees about accident prevention. These meetings achieve the following objectives:

- 1. Management gives employees instructions, training, and information that helps them avoid accidents.
- 2. Employees are motivated to new levels of safety consciousness that help them prevent accidents on and off the job.

In safety meetings, participants discuss actual accidents and identify their causes, both direct and indirect. They discuss unsafe practices or conditions and make plans to correct them. Safety meetings are opportunities to disseminate new information about practices, procedures, and equipment. Participants discuss current policies and procedures. Safety meetings generally serve to stimulate interest in accident and loss prevention.

## **Types of Meetings**

Several types of safety meetings are held, each satisfying a particular purpose or situation. Tailgate, town or department, supervisory, or committee meetings are routine, periodic meetings usually scheduled on a weekly or monthly basis. Nonroutine meetings, scheduled for special purposes, may include all of the employees at a particular location or several levels of management from various areas. Hold only those kinds of meetings that serve the purposes of your particular organization.

## Tailgate Meetings

A tailgate meeting is conducted by a construction and maintenance crew foreman with the crew before they leave the terminal or when they arrive at the job site. It is often conducted at the rear of the truck, hence its name. In a tailgate meeting, the foreman outlines the job at hand, points out potential hazards, and arranges for their elimination. These are informal, brief meetings, generally lasting from 5 to 15 minutes.

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Insurance and Claims		All G	as Service Locations

#### **Town or Department Meetings**

All employees in a town or department assemble for a meeting of this type. Usually held monthly, town or department meetings follow a prescribed agenda and last from 30 minutes to an hour, depending on the program content. The Local Manager or Department Manager presides at this meeting and encourages group discussion whenever appropriate.

Schedule I contains a list of suggested subjects for use in planning and conducting the program portion of these meetings. Schedule II contains an OSHA training compliance checklist containing required training topics with employees affected by each and their associated frequency of training. Schedule III contains a series of suggested annual subject schedules for such meetings. Schedule IV contains a suggested agenda for town or department meetings.

#### **Supervisors Meetings**

Supervisors meet to discuss accident and loss prevention measures on a monthly basis. The management representative responsible for the group represented by the participants presides over each meeting. The agenda includes discussion of the supervisory responsibility for loss prevention, methods for preventing accidents, and the cost of accidents to our Company.

#### **Committee Meetings**

Loss prevention committee are generally established in an area to serve as an advisory group to the local manager. Membership on this committee represents all major departments and includes members who are in both supervisory and non-supervisory positions. Participation in this form of committee is by local management appointment.

These committees, when established for an area, meet monthly for approximately an hour. Participants discuss hazardous conditions and practices they have observed and suspect and determine ways both to correct them and to stimulate employee interest. They then submit their recommendations to the local manager.

## Minutes of Meetings

One participant in each a town or department, supervisory, and committee group is appointed to record the minutes of each meeting. Minutes are not necessarily detailed, but they do include a record of the subjects discussed, the principal participants, the individuals who attended, the date and time of the meeting, any assignments or recommendations prepared, and any information that might have reference or follow-up value.

Use Form 755-113, Report of Safety Meeting or Training, for reporting these minutes. If the names of the participants are not included in the minutes, attach a separate attendance record. Maintain a copy of the minutes report locally. Form 755-113 is illustrated

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Insurance and Claims		All G	as Service Locations

in Exhibit A. Its use is explained for the most part in the instructions on the form itself and in the applicable captions.

## **Meeting Topics**

The Human Resources Department has safety material and aids available for your meetings. They are happy to provide suggestions or work with you in helping you prepare and obtain materials. Among the materials they can provide to you are a number of visual aids available upon request. Visual aids are very effective in stimulating interest in safety and imparting new information. Human Resources recommends that you preview the visual aids before any presentation in which you use them so that you can more effectively incorporate them into your program.

## Related Policies and Procedures

Policy AP-026 (Safety Meetings)

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Responsible Department		Affected Locations	
Insurance and Claims		All G	as Service Locations

## Schedule I Suggested Discussion Subjects

#### Care and Use of Equipment

- 1. Care and use of personal protective equipment.
- 2. Purpose and importance of grounding electrical equipment.
- 3. Care and use of ladders.
- 4. Safe use of chains, cables, and ropes.
- 5. Inspection and care of tools and equipment.
- 6. Storage, handling, and use of oxygen and acetylene cylinders.
- 7. Using hand tools safely.
- 8. Proper use of pneumatic tools and equipment.
- 9. Care and use of the Combustible Gas Indicator.
- 10. Care and use of the Carbon Monoxide Tester.
- 11. Care and use of respirators.

#### **Miscellaneous Practices**

- 1. How to look for gas leaks.
- 2. Effective use of traffic cones, barricades, and "Men Working" signs.
- 3. When and how to shore ditches.
- 4. Characteristics of natural gas.
- 5. Maintaining safety in emergency operations.
- Care and handling of pipe.
- 7. Consideration for the safety of your fellow employees.
- 8. How to protect your feet, legs, fingers, and arms.
- 9. Need for prompt and thorough reporting of accidents.
- 10. Reporting and correcting unsafe conditions.
- 11. Proper use of eye protection.
- 12. Inattention An accident factor,
- Proper method of lifting.
- 14. Meaning of "good housekeeping" and its part in preventing accidents.
- 15. Causes and control of static electricity.
- 16. Safe welding practices.
- 17. Proper procedure for light-up, meter turn on, set, or change.

### **Vehicle Safety**

- 1. Proper way to slow down to stop.
- 2. Approaching and entering intersections.

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## Schedule I (Continued) Suggested Discussion Subjects

- 3. Backing without accident.
- 4. State and local traffic laws and regulations.
- 5. Pre-departure and periodic inspection of important parts of vehicles.
- 6. The concept of defensive driving.
- 7. Safe passing procedure.
- 8. Securing the load The driver's responsibility.
- 9. Driving within lanes real or imaginary.
- 10. Parking safely.
- 11. Turning safely.
- 12. Following too closely.
- 13. Consideration and responsibility for employee-passengers.
- 14. Lane changing as an accident cause.
- 15. Off-road driving.

#### **Fire Prevention**

- 1. Types and uses of fire extinguishers.
- 2. Smoking and matches as fire causes.
- 3. "No Smoking" signs and areas.
- 4. Proper location and maintenance of fire extinguishers.
- 5. Common causes of fires and their prevention.
- 6. Safe storage and handling of flammable liquids.
- 7. Safe housekeeping practices.

### **Public Safety**

- 1. Avoiding damage to customer's property.
- 2. Our responsibility for safety to the customer.
- 3. Gas outage procedure.
- 4. "Red Tag" procedure.
- 5. Control of leaks through cathodic protection.
- 6. Odorization A safety factor.
- 7. Adverse effect of accidents upon customers.
- 8. Precautions in abandoning main or service.

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# Schedule I (Continued) Suggested Discussion Subjects

#### Safety at Home and Afield

- 1. Boating safety.
- 2. Safe practices while hunting
- 3. Hazards at Christmas time.
- 4. Safe practices in operating power mowers.
- 5. Vacation safety.
- 6. Home fires.

#### First Aid

- 1. Proper location and maintenance of first aid kits.
- 2. Artificial respiration.
- 3. Control of excessive bleeding
- 4. Shock (traumatic) Its cause, effect, and treatment.
- 5. Heat exhaustion, prostration, and sunstroke.
- 6. Care and treatment of fractures.
- 7. Proper use of dressings and bandages.

#### **Accident Prevention Program**

- 1. Accident records and rates within company, area, town, and department.
- 2. Safety award program.
- 3. Proper reporting of all accidents.
- 4. Accident prevention policies and procedures.

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# Schedule II OSHA Training Compliance Checklist

OSHA Training	Specific	Affected	Fre	quency of Tra	ining
Requirement	Regulation	Employees	Initial	Annual	Other
Respirator Use	29CFR 1910.134	Employees who use respirators	Х	х	
Hearing Conservation	29CFR 1910.95	Those requiring hearing tests	Х	Х	Х
Fork/Aerial Lift-powered Platforms	29CFR 1910. 66/67/178	Equipment users	Χ.		Х
Trenching and Excavation	29CFR 1926.650-652	C&M operations	Х	16	
Lockout/Tagout	29CFR 1910.147	All crafts	Х		Х
Hazard Communication	29CFR 1910.1200	Those using hazardous chemicals	X		X
Employee Emergency Evacuation	29CFR 1910.38 & .155	Ali employees	Х		
Fire Extinguishers	29CFR 1910.157	All employees	Х	Х	
Bloodborne pathogens	29CFR 1910.1030	Nurses, EMTs & designated first aid teams	Х		
CPR/First Aid	29CFR 1910.151	Site specific	Х		X
Personal Protective Equipment	29CFR 1910.132	Personal protective equipment users	X		
Hazard Recognition/Avoidance	29CFR 1926.21	All employees	Χ		
Confined spaces	29CFR 1910.146	Those entering confined spaces	X	·	Х
Traffic Control	29CFR 1926.201/202	C&M activities	Х		
Hand & Portable Powered Tools	29CFR 1910.242	Employees who use such equipment	Х		
Welding, Cutting, Brazing	29CFR 1910.252	All who perform these operations	Χ	Х	
Mechanical Power Presses	29CFR 1910.217	Operators of such equipment	Х		X
Asbestos Handling/Use	29CFR 1926.58	Asbestos removal workers	Х	X	
Hazardous Waste Sites	29CFR 1910.120	Site specific	Х	X	
Chemical Spill Clean-up	29CFR 1910.120(q)	Designated clean-up workers	Х		Х
Single/Multiple Piece Rim Wheels	29CFR 1910.177	Fleet Management	Х		
Process Safety-Highly Hazardous Chemicals	29CFR 1910.119	Processing/generation/ SDCW water TP	X		Х
Electrical Hazards	29CFR 1910.332	Those working with energized equipment	X		

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# Schedule III Suggested Annual Subject Schedules

Month	General	Specific	Discussion Subject
	Subject	Subject	, Discussion Subject
A. Town Pla			·
January	Public -		Adverse effect of accidents upon customers.
February	Job		Precaution in abandoning main or service.
March	Job		Using hand tools safely.
April	Public		How to perform the shut-in test.
May	Job	Traffic	Approaching and entering intersections.
June	Off-Job	Home	Safe practices in operating power mowers.,
July	Public	. ·	Avoiding damage to customers' property.
August	Job T	First Aid	Care and treatment of fractures.
September	Public		Emergency procedures.
October	Job	Fire Prevention	Common causes of fires and their prevention.
November	Job	Traffic	The concept of defensive driving.
December	Off-Job	Home	Hazards at Christmas time.
B. Meter Sh	ор		
January	Public	\	The regulator as a safety device.
February	Job	Traffic	Proper passing procedure.
March	Job	Fire Prevention	Storing and handling of flammables.
April	Job	First Aid	Treatment for shock.
May	Off-Job	Vacation	Swimming and boating safety.
June	Job		Handling materials and equipment.
July	Public		Meter safety.
August	Job	Traffic	Avoiding trouble at intersections.
September	Off-Job	Home	Some common home accidents and their prevention.
October	Job	Fire Prevention	Types of fire extinguishers and their uses.
November	Job		Prevention of falls.
December	Job	First Aid	Minor injuries and their treatment.
C. Construc	tion and/or N	laintenance Dep	partment
January	Public		Work area protection for the walking public.
February	Job	Traffic	Preventing rear-end collisions.
March	Job	First Aid	Minor injuries and their treatment.
April	Public		Barricading and guiding traffic.
May	Off-Job	Home	Causes and prevention of falls at home.
June	Job		Safe welding practices.
July:	Public		Prevention of damage to underground structures.
August	Job	Traffic	The concept of defensive driving.
September	Public		Emergency procedures.

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# Schedule III (Continued) Suggested Annual Subject Schedules

	General	Specific	
Month	Subject	Subject	, Discussion Subject
October	Job	Fire Prevention	Common causes of fires and their prevention.
November	Off-Job	Home	Hazards at Christmas time.
December	Job		The function of personal protective equipment
D. Service	and/or install	lation Departme	nt
January	Public		Avoiding damage to customers' property.
February	Job	Traffic	Prevention of rear-end collisions.
March	Job	First Aid	Minor injuries and their treatment.
April	Public		Adverse effect of accidents upon customers.
May	Off≈Job	Vacation	Swimming and boating safety.
June	Job		Using hand tools safely.
July	Public		How to perform the "shut-in" test.
August	Job	Traffic	Approaching and entering intersections.
September	Public		Emergency procedures.
October	Job	Fire Prevention	Types of fire extinguishers and their uses.
November	Job		Characteristics of natural gas.
December	Off-Job	itome	Hazards at Christmas time.
E. Stores De	epartment	<b>\</b>	
January	Job	\	Handling material and equipment.
February	Job	First Aid	Artificial respiration.
March	Job	Traffic	Problems at intersections.
April	Job		Falls and their prevention.
May	Off-Job	Vacation	Hazards on the highway.
June	Job		Storing and handling flammables.
July	Job		Care and use of hand tools.
August	Job	Traffic	Proper procedure for making turns.
September	Job		Preventing accidents through good housekeeping.
October	Job	Fire Prevention	Common fire causes and their prevention.
November	Job		Proper stacking of materials.
December	Off-Job	Home	Hazards at Christmas time.
F. Commerc	ial Office De	partment	
January	Public		Office safety.
February	Job	į	Prevention of falls.
March	Job	First Aid	Treatment for fainting.
April	Job	`	Safe use of sharp or pointed objects.
May	Off-Job	Vacation	Highway hazards.

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# Schedule III (Continued) Suggested Annual Subject Schedules

Month	General Subject	Specific Subject	› Discussion Subject	
June	Job		Preventing accidents through good housekeeping.	
June	Job		Preventing accidents through good housekeeping.	
July	Public		Making the customer's visit safe.	
August	Job	Traffic	The meaning of defensive driving.	
September	Job		Electrical hazards.	
October	Job	Fire Prevention	Common fire causes and their prevention.	
November	Job		Door and drawer hazards.	
December	Off-Job		Holiday hazards.	
G. Transmi	ssion			
January	Job	First Aid	Reporting and treating minor injuries.	
February	Off-Job	Home	Common home accidents and their prevention.	
March	Public		Proper installation and markings of highway crossings.	
April	Job		Emergency procedures.	
May	Job	Traffic	Proper method of turning and changing lanes.	
June	Job		Handling materials and equipment.	
July	Job	11	Safe welding practices.	
August	Off-Job		Safe storage and use of firearms.	
September	Public	)	Protecting livestock from distillate.	
October	Job	Fire Prevention	Location and use of fire extinguishing equipment.	
November	Job	Traffic	Special hazards in traveling production field roads.	
December	Job		Safety precautions in making a tap.	
H. Process	ing			
January	Job	First Aid	Minor injuries and their treatment.	
February	Job		Using hand tools/shop tools safely.	
March	Job	Traffic	The concept of defensive driving.	
April	Job	Fire Prevention	Use of fire extinguishers and fire protection systems.	
May	Off-Job	Home	Some common home accidents/fires and their prevention.	
June	Job		The function and use of personal protective equipment.	
July	Job	Fire Prevention	Review of refinery emergency plans.	
August	Job		Preventing accidents through good housekeeping.	
September	Job	Hazardous Materials	Handling and control of toxic substances and materials.	
October	Job	Fire Prevention	Storing and handling flammables.	
November	Off-Job	Home	Off-the-job safety.	
December	Job		Electrical hazards.	

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# Schedule IV Suggested Agenda for Town or Departmental Meetings

1. Call the meeting to order.

An official "call to order" marks the beginning of an organized meeting.

2. Introduce any new employees.

This practice introduces a bit of informality into the meeting. It also helps to put at ease new employees who are not generally acquainted as well as older employees.

3. Discuss any significant accidents (employee, public, vehicle) that have occurred since the last meeting.

You do not need to discuss all reported accidents, but certainly all significant ones. Present them by giving a brief explanation of what happened and how it could have been prevented.

4. Discuss any unsafe practices or conditions observed or reported since the last meeting.

Open for brief discussion any unsafe practices or conditions observed or reported since the last meeting. Also discuss any practice or conditions previously discussed that have not yet been corrected. At the same time, give appropriate instructions or assignments for necessary corrective action.

[Note: Approximately 15 minutes should be required for the first four items on the agenda.]

5. Program.

This is the "feature" part of the meeting. It should usually require about 30 minutes and be both stimulating and informative. You may give an assignment to a supervisor or an employee within the group to present the program or you may call in an outside speaker.

You can develop and follow an annual subject schedule. Schedules I and III of this procedure list a number of subjects that you might cover. Schedule II lists the training required by federal and state regulations; these subjects must be addressed.

Prepare a new annual subject schedule for each year and follow it. Properly prepared, such a schedule provides balanced emphasis on accident prevention. It

should include general subjects, specific subjects, and discussion subjects for each meeting of the year.

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A well-balanced schedule for a utility location normally includes:

- a. 50 percent of the time devoted to subjects on Job Safety (including vehicle operation).
- b. 33 percent of the time devoted to Public Safety.
- c. 17 percent of the time devoted to Off-the-Job Safety.

A program of monthly meetings would thus include six meetings on Job Safety, four meetings on Public Safety, and two meetings on Off-the-Job Safety during the year.

#### 6. Miscellaneous Items.

Completion of the program is normally a signal to adjourn. However, the Supervisor or Department Manager may wish to emphasize certain events that will occur prior to the next meeting. Such occurrences as the re-opening of schools, the start of the hunting season may need pointing out as warnings of the hazards they entail. Keep such items brief.

#### 7. Adjournment.

An official adjournment marks the close of an organized meeting.

[Note: The total time devoted to the meeting should be between 30 minutes and an hour.]

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# Exhibit A Form 755-113, Report of Safety Meeting or Training

LOCATION	SAFETY MEE	ORGANIZATIONA		DISTRICT	COMPANY	DATE	TIME
SAFETY	SUPERVISO	RS GATE		PLOYEES	SAFETY	OTHER (DESCRIBE)	
discussion and ATTENDANCE	I activities that to E ON REVERSE	ook place at the	meeting. Use	e additiona	al pages if you n	ensive descriptio eed more space. ture at the close of	RECORD
SUBJECTS DISCU	SSED						
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## AP&R ♦ Procedure

## Security Incident Reporting

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01/86	06/0	2/98	AP-P06
Responsible Department		Affected Locations	
HR Loss Contro	ol	All G	as Service Locations

## **Purpose**

To specify the procedure by which incidents are reported that result in property damage/loss or acts of violence. To report and track damage or loss caused by theft, burglary, robbery, or vandalism. To report and track acts of violence or situations that may lead to acts of violence (i.e., threats, harassment, and/or assaults).

## Damage Reporting

- 1. For incidents involving vandalism, theft, burglary, or robbery, use PNM Form 6776, 1/97, Security Incident Report.
- 2. Report to law enforcement agency(s) when appropriate.

## Violent Behavior Reporting

- 1. For incidents that were threatening, harassing, or assaulting in nature, use PNM Form 6776, 1/97, Security Incident Report.
- 2. Report to law enforcement agency(s) when appropriate.

## Completion of Forms

- 1. Check the appropriate category: Theft, Vandalism, Assault, Harassment, Threat, Burglary, or Robbery.
- 2. Identify involved parties, both employees and others.
  - a. Identify employee(s) by:
    - 1) Name
    - 2) Social Security Number
  - b. Identify non-employees by:
    - 1) Name
    - 2) Address
    - 3) Telephone Number

## Security Incident Reporting

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HR Loss Contro	ol	A11 G	as Service Locations	

- 3. Enter date and time of incident.
- 4. Enter location of incident
- 5. Describe injuries or property damages/losses
- 6. Describe incident, explain the roles of those involved
- 7. Indicate whether or not a law enforcement agency was notified
  - a. What agency(s)
  - b. Identify the contact
  - c. Indicate report number if one is assigned.
- 8. Identify who reported the incident, to whom, date and time.

Provide HR - Loss Control with a copy of PNM Form 6776 within 2 working days of the reported incident. Maintain a copy locally along with police and other related reports.

#### Related Policies and Procedures

Procedure AP-P07 (Security Incident Reporting)
Procedure AP-P09 (Work-Related Injury/Illness, Automobile Accidents and Public Liability Reporting)