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Transportation  
**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue SE  
Washington DC 20590

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# Pipeline Safety

## 2025 Gas Base Grant Progress Report

for

### PUBLIC UTILITIES COMMISSION NEVADA

**Please follow the directions listed below:**

1. Review the entire document for completeness.
2. Review and have an authorized signatory sign and date page 2.
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### **FedSTAR Information**

Electronic Submission Date: February 23, 2026 12:37 PM



**Pipeline and Hazardous Materials Safety Administration**  
1200 New Jersey Avenue, SE  
Washington DC 20590

**OFFICE OF PIPELINE SAFETY**  
**2025 Gas Base Grant Progress Report**

Office: PUBLIC UTILITIES COMMISSION NEVADA

Neil Pascual

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Authorized Signature

Neil Pascual

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Printed Name

Inspector

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Title

February 23, 2026 12:37 PM

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Date

## **PROGRESS REPORT ATTACHMENTS (GAS )**

### **PHMSA Form No. PHMSA F 999-92**

**Attachment 1: State Jurisdiction and Agent Status Over Facilities**

**Attachment 2: State Field Inspection Activity**

**Attachment 3: Facilities Subject to State Safety Jurisdiction**

**Attachment 4: Pipeline Incidents**

**Attachment 5: State Compliance Actions**

**Attachment 6: State Record Maintenance and Reporting**

**Attachment 7: State Employees Directly Involved in the Pipeline Safety Program**

**Attachment 8: State Compliance with Federal Regulations**

*{ There is no Attachment 9 }*

**Attachment 10: Performance and Damage Prevention Questions**

## Attachment 1 - Stats on Operators

### STATE JURISDICTION AND AGENT STATUS OVER GAS FACILITIES AS OF DECEMBER 31, 2025

Operator Type	State Agency Jurisdiction / Agent Status		No. of Operators	Operators Inspected		No. of Inspection Units	Units Inspected	
	No <sup>1</sup>	Yes		#	%		#	%
<b>Distribution</b>								
Private		X/60105	2	2	100.0%	3	3	100.0%
Municipal		X/60105	0	0	N/A	0	0	N/A
Master Meter		X/60105	1	1	100.0%	1	1	100.0%
LPG		X/60105	3	3	100.0%	8	8	100.0%
Other		X/60105	0	0	N/A	0	0	N/A
<b>Transmission</b>								
Intrastate		X/60105	8	8	100.0%	9	9	100.0%
Interstate	F		0	0	N/A	0	0	N/A
<b>LNG</b>								
Intrastate		X/60105	0	0	N/A	0	0	N/A
Interstate	F		0	0	N/A	0	0	N/A
<b>Other</b>								
Gathering Lines		X/60105	0	0	N/A	0	0	N/A
Offshore Facilities		X/60105	0	0	N/A	0	0	N/A
<b>Total</b>			14	14	100.0%	21	21	100.0%

<sup>1</sup>Codes: A - None in state and does not have jurisdiction;

B - State does not have jurisdictional authority (Provide current status or action being taken to obtain authority in notes section below)

F – No, State is currently not an interstate agent.

X/60105P = Yes, I have Section 60105 (Certification) over some of the operator type (meaning: I have 60105 authority over some, but not all of this operator type and do not have a 60106 agreement with PHMSA to inspect them). These operators are identified in the notes below.

X/IA - Yes, I have Interstate Agent jurisdiction over this type of operator

Distribution “Other” – ie Co-ops, Public Utility Districts, etc.

States should explain any special circumstances

**General Instructions** - All above facilities should only include facilities as defined by federal pipeline regulations and should not include extended jurisdiction by state regulation.

#### **Attachment 1 Notes:**

Nevada’s pipeline safety program (“PSP”) experienced some changes regarding the number of jurisdictional operators and inspection units being reported. As such, the number of operators and inspection units being reported in the 2025 progress report differs from those reported in the 2024 progress report. Those differences are outlined below:

Private Distribution - Nevada has 2 private LDC operators, those being Southwest Gas Corporation (“SWG”) and Sierra Pacific Power Company (d/b/a NV Energy). SWG is broken up into two units, Southern Nevada Division (“SND”) and Northern Nevada Division (“NND”). These comprise the three Inspection Unit figure outlined in the table above.

Municipal Distribution - Nevada does not currently have any Municipal Distribution natural gas or LPG facilities.

Master Meter - In 2012, as part of Docket No. 12-06043, the Public Utilities Commission of Nevada (“PUCN”) approved a plan to have aging master meter systems located within the LDC’s service territories replaced by new modern plastic pipeline systems owned and operated by the LDC. To-date approximately ten (10) of these such conversions have

occurred. There is only one (1) remaining known master meter natural gas systems in Nevada, that being Docs Cottages.

LPG - No changes in this category, last change was in 2024 with NV Energy converting the Rainbow bend LPG system to natural gas. Therefore, the current three (3) jurisdictional LPG operators (which makes up the eight (8) Inspection Units) in Nevada are as follows:

AmeriGas - 3 inspection units

Wendover Gas - 4 inspection units (all located in the City of West Wendover, NV. These units are typically inspected together and are broken out for incident reporting purposes)

Mt. Charleston Cabins - 1 inspection unit

The number of LPG operators and inspection units could change year to year as systems are converted to non-jurisdictional configurations or if the Nevada PSP were to find systems that are believed to be jurisdictional.

Transmission Intrastate - One (1) new transmission operator was added in 2025 that being Pinyon Pipeline Company, LLC. Per Docket No. 23-12023, Pinyon Pipeline constructed a 16-mile 24-inch intrastate natural gas transmission pipeline in order to provide the natural service required to convert the existing Valmy coal station to natural gas operation.

One (1) transmission operator changed names in 2025. The RNG facility operated by VR Ag Operations, LLC, was requested to be transferred to a new entity "Regenis" on January 15, 2025, so the name being reported on this 2025 Progress Report was updated.

As such, there are currently eight (8) jurisdictional Intra-State Transmission operators in Nevada and they are as follows:

Nevada Gold Mines - 2 jurisdictional inspection units

Empire Mining - 1 jurisdictional inspection unit

New Rise - 1 jurisdictional inspection unit

Prospector Pipeline Company - 1 jurisdictional inspection unit

Regenis - 1 jurisdictional inspection unit

Southwest Gas Corporation - 1 jurisdictional inspection unit

Sierra Pacific Power Company d/b/a NV Energy - 1 jurisdictional inspection unit

Pinyon Pipeline Company, LLC - 1 jurisdictional inspection unit

One of the existing intrastate transmission pipelines continued to be in idle status in 2024. The idle pipeline is the 36-mile Empire Mining Pipeline OPID 39536, (formerly owned by US Gypsum) which taps off the interstate Tuscarora pipeline. The pipeline is currently physically disconnected from the Tuscarora pipeline, and it is filled with a small amount of pressurized nitrogen. Depending on economic conditions it is unclear if this pipeline will ever be placed back in-service, but the operator, Empire Mining, currently wants to keep the pipeline viable just in case.

Intrastate LNG - There are currently no Intrastate LNG facilities in Nevada, but Nevada has adopted 49 CFR 193, so the current assumption is that if an Intrastate LNG facility were to be constructed it would be state jurisdictional and would fall under the purview of the PUCN.

Gas Gathering Pipelines - There are currently no jurisdictional gas gathering operators in Nevada.

## Attachment 2 – State Inspection Activity

### TOTAL STATE FIELD INSPECTION ACTIVITY AS OF DECEMBER 31, 2025

Operator Type	Standard Comprehensive	Design, Testing and Construction	On-site Operator Training	Integrity Management	Operator Qualification	Investigating Incidents or Accidents	Damage Prevention Activities	Compliance Follow-up	Total
<b>Distribution</b>									
Private	164.250	272.000	0.000	12.250	16.500	0.250	37.000	15.000	517.250
Municipal	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Master Meter	0.750	0.000	0.000	0.000	0.250	0.000	0.000	0.000	1.000
LPG	26.750	0.000	0.000	1.750	3.500	0.000	0.000	1.250	33.250
Other	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
<b>Transmission</b>									
Intrastate	46.750	24.250	0.000	19.000	7.000	0.000	0.000	1.500	98.500
Interstate	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
<b>LNG</b>									
Intrastate	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Interstate	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
<b>Other</b>									
Gathering Lines	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Offshore Facilities	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
<b>Total</b>	238.500	296.250	0.000	33.000	27.250	0.250	37.000	17.750	650.000

<b>Drug and Alcohol</b>	
Total Count of Drug and Alcohol Inspections:	6

#### **Attachment 2 Notes**

The inspection day numbers above are based upon an inspection day being a full 8 hours. Multiple operator types are sometimes inspected on the same day therefore the time on those days are allocated between the different operator types based upon inspection hours. Additionally, multiple inspection types are often performed on the same operator during multi-day inspections therefore the time is allocated to each inspection type being performed during these multi-day inspections (example: 4 hours OQ, 4 hours DIMP, 16 hours Standard). Adjustments are made for those inspections that are performed in excess of 8 hours to a single day in order to not overstate the figures for those few instances in which the inspector is in the field for greater than 8 hours in a single day.

Additionally, because Nevada PSP inspectors also perform One-Call inspections of excavators in the field (via a One-Call grant provided by PHMSA for gas and state funds for non-gas related inspections) to ensure that those excavators are complying with Nevada’s One-Call Law (NRS 455) when excavating around underground natural gas and other facilities; these One-Call inspections are tracked separately from the gas field inspections that are performed pursuant to 49 CFR 192. Nevada’s PSP tracks these different inspection hours separately, so the numbers above do not include the approximately 150 plus field inspection and enforcement activities relating to protecting natural gas facilities (including

PHMSA jurisdictional pipelines) via Nevada's One-Call Law performed in 2025.

The number of inspection field days in 2025 was very comparable to the number of inspection field days reported in 2024, in fact the number is slightly higher. This is a result of Nevada's PSP being fully Staffed in 2025, and several of its newer employees becoming qualified to lead certain types of inspections. Nevada's PSP attended fewer PHMSA T&Q classes in 2025, which helped in achieving the additional field days in 2025. Nevada does have several people participating in NAPSRS sponsored committees (NAPSRS/PHMSA Distribution Team, Plastic Pipe Database Committee, GPTC Committee, LPG and RNG Committees and the NARUC Pipeline Safety Staff Sub-Committee) and the resources needed to actively participate in those committees detracted a small number of field days in 2025 but it is not expected to have a material impact going forward.

Nevada PSP exceeded the minimum number of construction inspection days required by PHMSA (20 percent) with the construction inspection days in 2025 making up approximately 45 percent of all inspection days. With the significant construction and pipe replacements work occurring in Nevada this level of construction inspection activity was warranted and important. Numerous construction field inspections in the Intrastate Transmission category were performed in 2025 and were mainly associated with the new 16-mile, 24-inch Pinyon Pipeline that was constructed during the June to November 2025 time period.

Nevada also exceeded the minimum number of inspection days required per its 2025 SICT submittal of 412 days.

The strong overall number of inspection days were a result of performing numerous field inspections of LDC and LPG Operator standard inspection work activities including:

- Leak survey work
- Valve maintenance work
- Numerous leak repairs
- Taking rectifier and pipe to soil reads
- Regulator maintenance
- Odorant reads
- Emergency response and excavation damage repairs
- Etc.

The strong construction inspection day figure is associated with the following:

- Nevada being one of the fastest growing States and the significant new construction occurring statewide.
- Southwest Gas replaced some 30 miles of higher risk, more leak prone PVC and Aldyl A pipelines in its Southern Nevada division.
- Southwest Gas performing large school COYL (customer-owned yard line) replacement projects.
- Southwest Gas expanding its Nevada service territory to Mesquite and Spring Creek including all the construction activities associated with bringing natural gas to a new city/region.
- Pinyon Pipeline constructing its 16-mile, 24-inch transmission pipeline.
- NV Energy performed several pre-code steel replacement projects.

Nevada's PSP performed six (6) comprehensive Drug and Alcohol ("D&A") inspections in 2025. The operators related to those D&A inspections were, NV Energy, Southwest Gas, Regenis, New Rise, Empire Mining, and Prospector Pipeline.

Annual DIMP update meetings/reviews were performed on both large LDCs, those being Southwest Gas and NV Energy. Several DIMP related field inspections were also performed.

Annual TRIMP meetings/review were performed with both large transmission operators with HCAs/MSAs.

The strong TRIMP field inspection number is associated with several In-Line-Inspections ("ILI") that were performed by Southwest Gas and numerous dig and inspects that occurred as a result of those ILI runs.

The continued decline in the number of master meter and small LPG operator inspection units has allowed for increased inspections of larger, higher consequence LDC and transmission operators for 2025.

Nevada PSP held its 3-year pipeline operator seminar in 2024, resulting in minimal operator training days in 2025.

The quarter day in the incident investigation category occurred on March 25, 2025, and is associated with a house explosion/fire that occurred in the Southwest Gas, Southern Nevada service territory. The incident was determined to have started in the garage and involved non-jurisdictional piping.

### Attachment 3 – List of Operators

#### GAS FACILITIES SUBJECT TO STATE SAFETY JURISDICTION AS OF DECEMBER 31, 2025

Operator  Business Name Operator ID Address	Distribution (Operator type & Inspection Units)					Transmission (Operator type & Inspection Units)		LNG (Operator type & Inspection Units)		Other (Operator type & Inspection Units)	
	Private	Municipal	Master Meter	LPG	Other	Intrastate	Interstate	Intrastate	Interstate	Gathering Lines (Jurisdictional)	Offshore Facilities (State Waters)
32013 Amerigas Consolidated Systems 460 N Gulph Rd, King of Prussia, PA 89415	0	0	0	3	0	0	0	0	0	0	0
37064 Docs Cottages P.O. Box 3626, Stateline, NV 89449	0	0	1	0	0	0	0	0	0	0	0
39536 Empire Mining Co, LLC Nevada Highway 447 - MP 68, Empire, NV 89405	0	0	0	0	0	1	0	0	0	0	0
36756 Mount Charleston Resort Cabins 5355 Kyle Canyon Road, Las Vegas, NV 89124	0	0	0	1	0	0	0	0	0	0	0
30052 Nevada Gold Mines 1655 Mountain City Highway, Elko, NV 89822	0	0	0	0	0	2	0	0	0	0	0
39590 New Rise Renewables Reno, LLC 14830 Kivett Lane, Reno, NV 89521	0	0	0	0	0	1	0	0	0	0	0
18308 NV Energy (dba Sierra Pacific Power Company) 6100 Neil Road, P.O. Box 10100 Reno, NV 89520	1	0	0	0	0	1	0	0	0	0	0
40997 Pinyon Pipeline Company LLC. 370 VAN GORDON STREET, LAKEWOOD, CO 80228	0	0	0	0	0	1	0	0	0	0	0
38923 Prospector Pipeline Company 2981 Gold Canal Drive, Rancho cordova, CA 95670	0	0	0	0	0	1	0	0	0	0	0
40611 Regenis PO Box 2708, Ferndale, WA 98248	0	0	0	0	0	1	0	0	0	0	0
18536 Southwest Gas Corporation 8360 South Durango Drive, Las Vegas, NV 89113	2	0	0	0	0	1	0	0	0	0	0
31497 Wendover Gas Company 460 Mesa Street, Wendover, NV 89883	0	0	0	4	0	0	0	0	0	0	0

Operator	Distribution (Operator type & Inspection Units)					Transmission (Operator type & Inspection Units)		LNG (Operator type & Inspection Units)		Other (Operator type & Inspection Units)	
	Business Name Operator ID Address	Private	Municipal	Master Meter	LPG	Other	Intrastate	Interstate	Intrastate	Interstate	Gathering Lines (Jurisdictional)
Inspection Unit totals by type	3	0	1	8	0	9	0	0	0	0	0

## Total Operators

12

### Attachment 3 Notes:

The Operators listed above as well as the number of inspection units match the number reported in Attachment 1 of this Progress Report, when considering that NV Energy operates two types of systems (Transmission and LDC/Private) and Southwest Gas operates two types of systems (Transmission and LDC/Private).

One intrastate transmission pipeline continues to be in idle status in 2025. The 36-mile Empire Mining Pipeline OPID 39536, (formerly owned US Gypsum) which taps from the interstate Tuscarora pipeline is currently physically disconnected from the Tuscarora pipeline and it is filled with a small amount of pressurized nitrogen. Depending on economic conditions it is unclear if this pipeline will ever be placed back in-service, but the operator, Empire Mining, currently wants to keep the pipeline viable just in case.

As outlined in Attachment #1, one (1) new transmission operator was added in 2025 that being Pinyon Pipeline Company, LLC. Per Docket No. 23-12023, Pinyon Pipeline constructed a 16-mile 24-inch intrastate natural gas transmission pipeline in order to provide the natural gas service required to convert the existing Valmy coal station to natural gas operation. One (1) transmission operator changed names in 2025. The RNG facility operated by VR Ag Operations, LLC, was requested to be transferred to a new entity “Regenis” on January 15, 2025, so the name being reported on this 2025 Progress Report was updated.

**Attachment 4 – Incidents/Accidents**

**SIGNIFICANT GAS INCIDENTS/ACCIDENTS JANUARY 1, THROUGH DECEMBER 31, 2025**

Date of Incident	Location – City/County/ etc.	System Type	Injuries #	Fatalities #	Property Damages <sup>3</sup> \$	Operator Cause Code <sup>1</sup>	State Cause Code <sup>1</sup>
Name of Operator: Operator ID: <span style="float: right;">Report No:</span> Summary <sup>2</sup>							

**High Level Cause Codes: A - Corrosion failure; B - Natural Force Damage; C - Excavation Damage; D - Other Outside Force Damage; E - Pipe, Weld or Joint Failure; F - Equipment Failure; G - Incorrect Operation; H - Other Incident Cause; IP - Investigation Pending;**

**<sup>2</sup>Please include a summary or report of the state agency's investigation of each of the above incidents.**

**<sup>3</sup>Interstate agents should use the 191.3 Incident definition for listing incidents investigated on interstate facilities.**

**Attachment 4 Notes:**

Nevada had no Federal Reportable Incidents within our jurisdiction in 2025.

## Attachment 5 – Stats on Compliance Actions

### STATE COMPLIANCE ACTIONS – CALENDAR YEAR (CY) 2025

Probable Violation Categories	Intrastate	Interstate
Number carried over from all previous CY's	0	0
Number Found During CY	14	0
Number submitted for DOT action [60106 Agreement agent only]	0	0
Number corrected during CY (including carry over from previous year(s))	12	0
Number to be corrected at end of CY (including carry over)	2	0

**Number of Compliance Actions Taken 1** 20  
(see definition)

#### Civil Penalties

Number assessed during CY	1
Dollars assessed during CY	\$20,000.00
Number collected during CY	1
Dollars collected during CY	\$20,000.00

**Do not double count for a related series of actions.**

#### Attachment 5 Notes

The \$20,000 civil penalty figure issued in 2025 is comprised of one (1) civil penalty proceeding. The following is a summary of that civil penalty case:

#1 - A civil penalty totaling \$20,000 was assessed against Southwest Gas Corporation (“Southwest Gas”), OPID 18536. This civil penalty was associated with multiple operator at-fault excavation damages that occurred in Q1 and Q2 of 2024. In total nine (9) operator at-fault damages occurred which was higher than normal. After several months of negotiations, on March 12, 2025, Staff and Southwest Gas reached a settlement agreement and filed a Stipulation outlining a \$20,000 civil penalty associated with violations of 49 CFR 192 and Nevada’s One-Call Law NRS 455. Additionally, the Stipulation also outlined \$34,000 in pipeline safety enhancements that Southwest Gas was required to perform and those enhancements were areas follows:

Four thousand dollars (\$4,000) contribution to the Nevada Regional Common Ground Alliance ("NRCGA") to help promote damage prevention and 811 awareness; and thirty thousand dollars (\$30,000) towards improving Southwest Gas' ticket management system, with Southwest Gas donating to NRCGA any portion of the \$30,000 not spent on ticket management system improvements. The stipulation filing was designated as Docket No. 25-03014. On May 7, 2025, the PUCN accepted the Stipulation and issued an order. The civil penalty payment amount of \$20,000 was paid on May 29, 2025.

Nevada’s PSP and the PUCN also assessed \$46,000 (12 different cases) in civil penalties in 2025 to excavators/operators for violations of Nevada’s One-Call Law (NRS 455). Because these violations were not associated with 49 CFR 192, they are not included in the civil penalty figures above. However, Nevada’s PSP believes it is important to inform PHMSA of these penalties given that PHMSA is evaluating States as to whether they have effective One-Call Law/Enforcement, and these enforcement efforts also include protecting PHMSA jurisdictional interstate pipeline facilities.

There are two (2) carry over Probable Violations (“PV”) that were not fully addressed in 2025 and are being carried over to 2026, and those PVs are as follows:

1. This PV is associated with regulator station vault field inspections that were performed as part of the 2025-Q4 Audit. It was discovered that Southwest Gas had installed rain caps on numerous vault vents thereby restricting the air flow and making the vents not compliant with the requirements of 49 CFR 192.187. Southwest Gas had not corrected all of the vault vents by the end of the year and therefore the PV and required corrective action is carried over to 2026.

2. This PV is associated with a Nevada State Reportable Incident that occurred on October 8, 2025, whereby a Southwest Gas Pipeline Contractor mistakenly cut a high voltage underground electrical cable thinking it was an abandoned gas line. The contractor suffered serious burns but there was no release of gas and therefore the incident did not meet the definition of a Federal Reportable Incident. The contract employee who cut the electrical cable was not a qualified pipe joiner/fitter and the PV was associated with the employee not being properly qualified for the task he was being asked to perform. The NOPV letter was sent out on December 12, 2025, and a response was not due until January 2026, thereby making this PV carry over to 2026.

## **Attachment 6 – List of Records Kept**

### **GAS STATE RECORD MAINTENANCE AND REPORTING DURING CY 2025**

#### **Records Maintained by the State Agency**

Records of inspections, probable violations, follow-up actions and enforcement activities.

Records of expenditures for the Gas Pipeline Safety Program.

Letters, directives, correspondence, certification, authorizations, etc.

Requested Interpretation Requests and Waiver Request Information.

Some NTSB reports and various AID safety releases.

Guidelines for States participating in the Gas Pipeline Safety Program.

Pipeline Safety Regulations (49 CFR Parts 191, 192, 193 and 199) including amendments.

Information related to T&Q training.

Records and correspondence from PHMSA program evaluations.

NAPSR correspondence and NAPSR survey responses

Incident Reports and Investigation Documentation.

Probable Violation Log.

One-Call Enforcement Log.

Pipeline Safety Manual / Procedures

Records for Pipeline Safety personnel Activity Tracking

#### **Reports Required from Operators**

Incident reports.

Annual reports.

Annual Results of Drug and Alcohol testing for applicable operators.

Operations Manuals.

LDC quarterly/yearly damage cause data.

Notification emails on excavation damages from larger operators.

Some misc. audit related documents, such as leak trend analyses, ILI Reports, ECDA Reports, etc.

Annual odor call and leak call emergency response times

**Attachment 6 Notes**

**Attachment 7 – Staffing and TQ Training**

**STATE EMPLOYEES DIRECTLY INVOLVED IN THE GAS PIPELINE SAFETY PROGRAM DURING CY 2025**

<b>Name/Title</b>	<b>% Time</b>	<b># Months</b>	<b>Qual. Cat.</b>
<b>Supervisor</b>			
Neil Pascual Senior Gas Pipeline Engineer	49.350	12	II
Paul Maguire Manager Engineering	22.200	12	I
<b>Inspector/Investigator</b>			
Adelere Adesina Gas Pipeline Engineer	95.600	12	I
Carson Alexander Gas Pipeline Engineer	96.400	12	I
Dennis Bott Gas Pipeline Engineer	73.900	12	II
Kelly Everson Gas Pipeline Engineer	99.800	12	II
Mike Evans Gas Pipeline Engineer	98.700	12	II
Neil Pascual Senior Gas Pipeline Engineer	49.350	12	II
Paul Maguire Manager Engineering	30.000	12	I
<b>Clerical and Administrative Support</b>			
Cyndi Martin Administrative Assistant, Carson City	28.930	12	IV

**Summary**

<b>Employee Type</b>	<b>No. of Staff</b>	<b>Person-Years</b>
Supervisor	2	0.720
Damage Prevention/Technical	0	0.000
Inspectors/Investigators	7	5.440
Clerical/Administrative	1	0.290
<b>Total</b>	<b>10</b>	<b>6.440</b>

**Attachment 7 Notes**

List of employees and time percentages in Pipeline Safety

-Neil Pascual was split 50/50 between Supervisor and Inspector  
-Paul Maguire spent approximately 52% of his total work time (2080 hours per year) on pipeline safety base grant activities, with 30% performing inspections and 22.2% as a supervisor.

2025 T&Q training classes:

- Daniel 0
- Dennis 6 (This completed his core classes)
- Kelly 0
- Carson 3 (These were all IMP Specialty classes)
- Mike 0
- Neil 0
- Paul 0

One of Nevada's more senior inspectors passed away at the beginning of November-2023, and a replacement (Dennis Bott) was on-boarded in Jan-2024. In 2025, Dennis completed all of the core T&Q classes and is now qualified to lead all Standard Inspections. Dennis is expected to complete the specialty classes in 2026. Carson Alexander was hired in mid-May 2022, and he has completed his core T&Q classes plus all specialty T&Q classes (less root cause). Carson is now qualified to perform all inspections.

The Senior Gas Pipeline Engineer position is a half-inspector/half-supervisor position which is why Neil's position is divided as 50 percent Supervisor and 50 percent Inspector. 98.7% of his time was split between the two positions with the remaining 1.3% spent on State One-Call inspections and enforcement issues which is not allocated against the Base Grant but instead is charged against Nevada's One Call Grant or paid for by the State itself.

Engineering Manager, Paul Maguire, has all core T&Q classes, including the OQ class, and is fully qualified to lead standard, construction, DIMP, Control Room, LPG and OQ inspections. As such, it is estimated that Paul Maguire will perform roughly 50 to 70 inspection days per year, which equates to 40 to 50 percent of the time he spends on pipeline safety activities. The other time Mr. Maguire spends is supervisory in nature, including reviewing NOPV Letters and being on the NARUC pipeline safety Staff subcommittee, the NAPSRLPG and RNG subcommittees and attending NAPSRL regional meetings.

All Nevada pipeline safety engineers/inspectors also perform One-Call inspections and enforcement of Nevada's Call Before Your Dig Law ("NRS 455") which is why each of those Inspector's time is less than 100 percent. The time spent inspecting and enforcing NRS 455 is tracked separately, and those costs are not included in the Base Grant and are instead allocated to the PHMSA awarded One-Call Grant.

Four of the six Nevada PSP Inspectors in 2025 have completed all the IMP classes and the Root Cause class.

With Carson Alexander having an engineering degree and with him being with the PUCN for more than 3 years now, Carson's qualification moves up to Level I.

With Dennis Bott having completed all core T&Q classes, and with Dennis having 20 plus years experience in the pipeline industry, Dennis' qualification moved up to Level II.

## Attachment 8 – Compliance with Federal Regulations

### STATE COMPLIANCE WITH FEDERAL REQUIREMENTS AS OF DECEMBER 31, 2025

No.	Effective Date	Impact	Adoption Date	Adoption Status
<b>1</b>		<p><b>Maximum Penalties Substantially same as DOT (\$272,926/\$2,729,245). State must adopt minimum penalties of at least (\$100,000/\$1,000,000). Indicate actual amount in notes.</b></p> <p>The PUCN’s regulations (NAC 704.460) automatically adopts the latest Federal Pipeline Safety Regulations contained in 49 CFR 191, 192, 193 and 199.</p> <p>The PUCN successfully passed Senate Bill 321 in October 2025 which automatically matches Nevada’s maximum penalty amount to the DOT’s.</p> <p>The PUCN was successful in getting new legislation passed (during the current 2021 session) to have the blanket exemption for natural gas utilities from having to have professional engineers review and stamp interstate natural gas utility projects removed. This legislation change was a result of the NTSB recommendations that came out of the 2018 Merrimack Valley, MA, pipeline safety incident and report. The new legislation was passed via Assembly Bill 173 during the 2021 Nevada Legislative Session. A Rule Making Docket, Docket No. 21-06039, was opened by the PUCN after the passage of the bill and that Rule Making Docket outlines, via regulations, what types of natural gas utility projects require the review of a Nevada licensed professional engineer. The NTSB has officially closed out the Recommendation issued to the State of Nevada stemming from the 2018 Merrimack Valley, MA pipeline safety incident.</p> <p>During the 2023 Nevada Legislative Session, the PUCN was successful in getting Senate Bill 27 passed which removed the blanket hand tool exemption from Nevada’s One-Call Law, NRS 455. This change in the law should help reduce excavation damages even further that record low levels currently being achieved.</p>	08/2025	Adopted (\$272,926/\$2,729,245)
Note				
<b>2</b>		<b>Part 192 Amendments</b>		
1-124 Note	Pre 2020	[All applicable amendments prior to and including 2019] Adoption of all amendments prior to 2019	12/31/2019	Adopted
125 - 84 FR 52180 Note	7/1/2020	Pipeline Safety: Safety of Gas Transmission Pipelines: MAOP Reconfirmation, Expansion of Assessment Requirements, and Other Related Amendments Pursuant to NAC 704.460, this regulation was automatically adopted	7/1/2020	Adopted
126 - 86 FR 2210 Note	3/12/2021	Pipeline Safety: Gas Pipeline Regulatory Reform (Delayed to 3/21) (Delayed Compliance date 10/12/2021)	03/12/2021	Adopted
127 - 86 FR 63266 Note	5/16/2022	Safety of Gas Gathering Pipelines: Extension of Reporting Requirements, Regulation of Large, High-pressure Lines, and Other Related Amendments Pursuant to NAC 704.460, this regulation was automatically adopted	05/16/2022	Adopted
128 - 87 FR 26296 Note	5/16/2022	Pipeline Safety: Safety of Gas Gathering Pipelines: Extension of Reporting Requirements, Regulation of Large, High-Pressure Lines, and Other Related Amendments. Response to a Petition for Reconsideration; Technical Corrections; Issuance of Limited Enforcement Discretion	5/16/2022	Adopted
129 - 87 FR 20940 Note	10/5/2022	Pipeline Safety: Amendments to Parts 192 and 195 to Require Valve Installation and Minimum Rupture Detection Standards.	10/5/2022	Adopted

130 - 87 FR 52224	5/24/2023	Pipeline Safety: Safety of Gas Transmission Pipelines: Repair Criteria, Integrity Management Improvements, Cathodic Protection, Management of Change, Other Related Amendments, and Technical Corrections	5/24/2023	Adopted
Note	Pursuant to NAC 704.460, this regulation was automatically adopted			
131 - 88 FR 24708	5/24/2023	Pipeline Safety: Safety of Gas Transmission Pipelines: Repair Criteria, Integrity Management Improvements, Cathodic Protection, Management of Change, and Other Related Amendments: Technical Corrections	5/24/2023	Adopted
Note	Pursuant to NAC 704.460, this regulation was automatically adopted			
132 - 88 FR 50056	8/1/2023	Pipeline Safety: Requirement to Valve Installation and Minimum Rupture Detection Standards: Technical Corrections	8/1/2023	Adopted
Note	Pursuant to NAC 704.460, this regulation was automatically adopted			
133 - 89 FR 33264	6/28/2024	Periodic Updates of Regulatory References to Technical Standards and Miscellaneous Amendments	6/28/2024	Adopted
Note				
134 - 89 FR 53880	6/28/2024	Periodic Updates of Regulatory References to Technical Standards and Miscellaneous Amendments; Technical Correction	6/28/2024	Adopted
Note				
135 - 89 FR 53880	6/28/2024	Pipeline Safety: Requirement to Valve Installation and Minimum Rupture Detection Standards:response to Petition for reconsideration; Additional Technical Corrections	6/28/2024	Adopted
Note				
136 - 90 FR 3713	1/15/2025	Pipeline Safety: Safety of Gas Transmission Pipelines: Repair Criteria, Integrity Management Improvements, Cathodic Protection, Management of Change, and Other Related Amendments: Corrections To Conform to Judicial Review	1/15/2025	Adopted
Note				
137 - 90 FR 21434	5/20/2025	Editorial Change To Reflect the Name Change of the Gulf of Mexico to the Gulf of America	5/20/2025	Adopted
Note				
138 - 90 FR 28094	7/1/2025	Periodic Updates of Regulatory References to Technical Standards and Miscellaneous Amendments; Additional Technical Amendments; Response to Petition for Reconsideration	7/1/2025	Adopted
Note				
139 - 90 FR 28082	1/1/2026	Standards Updates	1/1/2026	Adopted
Note				
<b>3</b>	<b>Part 193 Amendments (applicable only where state has jurisdiction over LNG)</b>			
1-23	Pre 2011	[All applicable amendments prior to and including 2010]	12/31/2019	Adopted
Note	Adoption of all amendments prior to 2019			
24 - 78 FR 58897	10/25/2013	Administrative Procedures, Updates, and Technical Corrections	09/2013	Adopted
Note				
25 - 80 FR 168	3/6/2015	Periodic Updates of Regulatory References to Technical Standards and Miscellaneous Edits	03/2015	Adopted
Note				
<b>4</b>	<b>Part 199 - Drug Testing</b>			
53 FR 47096	11/21/1988	Part 199 - Drug Testing	04/2000	Adopted
Note				

<b>5 Part 199 Amendments</b>				
1-24 Note	Pre 2011 Adoption of all amendments prior to 2019	[All applicable amendments prior to and including 2010]	12/31/2019	Adopted
25 - 78 FR 58897 Note	10/25/2013	Administrative Procedures, Updates, and Technical Corrections	09/2013	Adopted
26 - 80 FR 168 Note	3/6/2015	Periodic Updates of Regulatory References to Technical Standards and Miscellaneous Edits	03/2015	Adopted
27 - 82 FR 7972 Note	3/24/2017	Operator Qualification, Cost Recovery, Accident and Incident Notification, and Other Pipeline Safety Changes	3/2017	Adopted
28 - 84 FR 16770 Note	4/23/2019	Conforming Amendments and Technical Corrections to Department Rules Implementing the Transportation Industry Drug Testing Program	04/23/2019	Adopted
<b>6 State Adoption of Part 198 State One-Call Damage Prevention Program</b>				
a. Note		Mandatory coverage of areas having pipeline facilities	07/1987	Adopted
b. Note		Qualification for operation of one-call system	07/1987	Adopted
c. Note		Mandatory excavator notification of one-call center	07/1987	Adopted
d. Note		State determination whether calls to center are toll free	07/1987	Adopted
e. Note		Mandatory intrastate pipeline operator participation	07/1987	Adopted
f. Note		Mandatory operator response to notification	07/1987	Adopted
g. Note		Mandatory notification of excavators/public	07/1987	Adopted
h. Note		Civil penalties/injunctive relief substantially same as DOT	10/1991	Adopted

**If Adoption Status is No, Please provide an explanation**

State Attendance at 2025 NAPS Regional Meeting: Attended full time (Lead rep or alternative pipeline staff)  
Frequency of General Legislative Session: Biennially

**Attachment 8 Notes**

## Attachment 10 – Performance and Damage Prevention Questions

### CALENDAR YEAR (CY) 2025

#### **Planned Performance: What are your Planned Annual and Long-term goals for your Pipeline Safety Program?**

The Nevada Pipeline Safety Program will continue to audit and/or inspect every jurisdictional operator in Nevada. This includes our quarterly audits of our three LDC inspection units, which comprise approximately 90 percent of the jurisdictional pipelines in Nevada.

In 2026, the quarterly audits will focus on  
Q1 - A full Procedures review including OQ Plans  
Q2 - TRIMP audit  
Q3 - Damage Prevention audit  
Q4 - Control Room audit

In addition to these quarterly audits, the Nevada Pipeline Safety Program will also conduct various field inspections. These field inspections are a core to pipeline safety as construction inspections provide one of the only opportunities to overserve the pipeline as it goes into the ground. Operations and maintenance are the other component of field inspections ensuring that our operator's maintenance activities adhere to both federal code and their own operations manuals. This also includes an annual audit of the one jurisdictional compressor station in Nevada, the Southwest Gas Southern Nevada compressor station.

Nevada Pipeline Safety Staff will continue to work with the Operators to review results of the Nevada annual leak survey law and its effects on their DIMP plans.

Nevada's newest inspector has completed all his core classes and hopes to have him complete most if not all the specialty TQ courses. He will also have the opportunity to participate in many of the audits.

Gas pipeline excavation damages continue to be one of the main causes for unplanned releases of gas from a pipeline. Nevada's rapidly growing infrastructure and numerous construction projects make this threat even more pronounced. As such, the Nevada Pipeline Safety personnel will continue to investigate gas pipeline damages with an objective to investigate all of them and up to half of them in the field.

#### **Past Performance: What did the Pipeline Safety Program accomplish during the subject year (to this document) to contribute toward the program's annual and long-term goals?**

In 2025, The Nevada Pipeline Safety Program completed audits on 100% of its jurisdictional Operators in 2025. The third year of annual leak surveys were completed. There were no federally reportable incidents in 2025. Nevada's gas damages per 1,000 tickets were 1.32. This represents the lowest amount since we began tracking this metric in the year 2000.

#### **1. Has the state or agency reviewed the Damage Prevention Assistance Program (DPAP) document in the last twelve months?**

Yes

#### **2. Has the state or agency developed or is in the process of developing a plan to address the nine elements contained in the PIPES Act of 2006 for an effective State Damage Prevention Program?**

Yes

**If yes to question 2, where does the state or agency stand on implementation of the nine elements contained in the PIPES Act**

**of 2006? Please provide a description of how the state or agency has or will meet each element. If not, please provide a brief passage explaining the reasons why the state or agency has not.**

All 9 Elements have been implemented by Nevada. The majority of the Elements have been implemented through the Nevada Regional Common Ground Alliance (“NRCGA”). Implementation of Elements 6 and 7 (Enforcement) is primarily a function of the Public Utilities Commission of Nevada (“PUCN”), its pipeline safety program (“PSP”) and its Staff legal department.

Element (1), Enhanced Communications between operators and excavators.

Nevada’s One-Call Center, USA North (“USAN”), is a member of the NRCGA and participates in the monthly NRCGA meetings. These meetings and USAN’s participation gives all stakeholders (operators and excavators) the opportunity to discuss the operations of the One-Call Center. As of January 2025, the PUCN has implemented the use of Positive Response. Through the One-Call Center, ticket stakeholders (excavators, operator and locators) are able to determine ticket status up to completion.

Element (2), Fostering Support and partnership of all stakeholders.

This has been accomplished through the participation of operators, excavators, USAN, and the PUCN pipeline safety program Staff during the monthly NRCGA meetings. At least one member of the PUCN’s pipeline safety group typically attends the monthly NRCGA meetings which are video linked to both Reno and Las Vegas.

Element (3), Operator use of performance measures for locators.

The two local distribution companies (“LDCs”) Southwest Gas and NV Energy have Quality Assurance/Quality Control (“QA/QC”) measures for locators and use the QA/QC measures to drive improvements. Additionally, both operators track the cause of each damage, including miss-marks and report that data on an annual basis to the CGA DIRT database. These damage numbers are reviewed at least quarterly/yearly (depending on Operator size), in order to track locating company performance.

Element (4), Stakeholder partnership in employee training.

Excavator training has been developed and implemented through the NRCGA with the assistance of the PUCN pipeline safety group and LDC operators. Training sessions are held on a regular basis, and on-site training sessions are available and are often put on at excavating company offices in order to allow for more training and easier access.

Element (5), Partnership in Public Education.

The PUCN is a paying and participating member of the NRCGA. The NRCGA has a Public Outreach Sub-Committee, which the PUCN Staff also participates in. Pipeline Safety Staff participates in several outreach and educational events such as 811 Day, The Golden Shovel Awards, The Locate Rodeo, etc.

Element (6), Enforcement agencies role to help resolve issues.

The PUCN has authority to enforce Nevada’s One-Call Law (NRS 455). Verbal warnings are given in the field for minor violations that are discovered. If the verbal warnings are not effective and repeat violations are observed, a formal written Warning Letter is sent from the PUCN Staff Legal Counsel to the violating operator/excavator. If further violations are found after a Warning Letter has been issued or if egregious acts are discovered, the PUCN Staff can file a Formal Complaint Petition with the PUCN requesting civil penalties be assessed against those operators/excavators who continually violate and/or egregiously violate NRS 455.

Element (7), Fair and consistent enforcement of the law.

Nevada’s One-Call Statute, NRS 455 was revised during the 2007 legislative session to include Enforcement by the PUCN Staff. Since that time the PUCN Staff, with the help of its Staff Counsel Division, has developed procedures for enforcing NRS 455. Additionally, in 2015 the civil penalty amounts outlined in NRS 455 were increased from \$1000 per day per violation to \$2,500 per day per violation. Also, there is now a provision in the law that allows the civil penalty amount to be tripled if the violation involves high consequence facilities, such as pipelines operating above 90 PSI. In 2023, legislation was passed to include hand-digging as part of excavation to help foster a reduction of damages from hand-held equipment such as ground rod stakes.

Element (8), Use of Technology to improve the locating process.

USA North has worked with the NRCGA to develop an app for ticket management for contractors to provide information whether a request is valid, expired or in process. This will especially be helpful for contractors with managing multiple dig tickets. There is also a drive to promote on-line ticket processing. The PUCN is working with the NRCGA to explore new technologies such as ticket management systems for contractors and ground penetrating radar (GPR) to enhance potholing identification.

Element (9), Data analysis to continually improve program effectiveness.

The primary measure of program effectiveness is the number of dig-ins by year and the number of damages per 1000 tickets. Nevada has been tracking this data since 2000. The 1.32 damages per 1,000 tickets in 2025 represents the lowest damage number in Nevada's history.

### **Attachment 10 Notes**