


## MEMORANDUM

TO: All New Mexico Liquefied Petroleum Gas Licensed Contractors Holding an Active RIN with the Department of Transportation  
FR: Bureau Chief James Morrison   
DT: September 22, 2025  
RE: INTERPRETATION AND APPLICATION OF 19.15.40.15 NMAC LICENSE CLASSIFICATIONS, SCOPES AND FEES

This memorandum serves to give notice to all New Mexico LP Gas licensees holding an active Requalification Identification Number (RIN) with the U.S. Department of Transportation of the interpretation and application of 19.15.40.15 NMAC License Classifications, Scopes and Fees related to portable propane gas cylinder tank inspections and replacement of cylinder valves by LP 05 and LP 09 classifications.

### PURPOSE

The purpose of [19.15.40](#) NMAC is to promote the general welfare of the people of New Mexico by providing for the protection of life and property through standards that, when complied with, will result in safer installations, equipment, facilities, appliances, structures, and service.

### BACKGROUND

Currently, LP 09 licensees have been prohibited from replacing portable propane gas cylinder valves without a licensed LP 05 being physically present at the site location at the time of the valve replacement. This interpretation of 19.15.40 resulted from safety concerns with the LP 09 not having proper training to perform portable propane gas cylinder valve exchanges.

### INTERPRETATION AND APPLICATION

The Liquefied Petroleum Gas Bureau (Bureau) has adopted the 2020 NFPA 58 Liquefied Petroleum Gas Code. NMAC 19.15.40.24(B). The 2020 NFPA 58 Code permits the inspection and repair of portable propane gas cylinders by facilities registered with the U.S. Department of Transportation (DOT) pursuant to 49 C.F.R. § 107.805. DOT requires employees of licensees holding a RIN to satisfactorily complete training that address safety issues related to the inspection of portable gas cylinders.

Effective immediately, any licensed LP Gas facility holding an active RIN with the DOT who employs a LP 05 for the site-specific location may allow a LP 09 employed at that location to inspect and replace portable propane gas cylinder valves when properly trained in accordance with CGA C-6 Standards for Visual Inspection of Steel Compressed Gas Cylinders and C-6.3 Standard for Visual Inspection of Low Pressure Aluminum Alloy Compressed Gas Cylinders. The licensee holding the RIN must maintain current records of satisfactory completion of training requirements at the site location for each LP 09 who replaces propane gas cylinder valves on behalf of the licensee and the DOT RIN documentation. All documentation shall be available for inspection by Bureau inspectors during regular business hours.

