



Alex Hughes
Pipeline Safety & Compliance Manager
1775 Sampson Ave, ML8064
Corona, CA 92879
949-697-2539
AHughes@SoCalGas.com

December 13, 2022

Mr. Terence Eng, P.E.,
Program Manager, Gas Safety and Reliability Branch,
Safety and Enforcement Division,
California Public Utilities Commission,
505 Van Ness Ave, 2nd Floor
San Francisco, CA 94102

Dear Mr. Eng:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC) conducted a General Order (G.O.) 112-F Comprehensive Operations and Maintenance Inspection at the following Southern California Gas Company (SoCalGas) Compressor Stations on February 8-11 and 14-18, 2022.

- | | |
|-------------------------------------|--|
| 1. Blythe Compressor Station | 6. Newberry Springs Compressor Station |
| 2. South Needles Compressor Station | 7. Wheeler Ridge Compressor Station |
| 3. North Needles Compressor Station | 8. Sylmar Compressor Station |
| 4. Kelso Compressor Station | 9. Ventura Compressor Station |
| 5. Adelanto Compressor Station | |

The inspection included a review of the Station's Leak Survey, Patrol, Cathodic Protection, Valves, Overpressure protection (reliefs and shutdowns valves), Emergency Shut Down (ESD) system, Gas Detection and Alarm systems inspection records for calendar years 2018 thru 2021 and field inspections of the facilities at the Compressor Stations. In addition, SED's staff reviewed Operator Qualification records, which included field observation of randomly selected individuals performing covered tasks.

SED's staff identified zero (0) probable violations and identified one (1) area of concern. Attached are SoCalGas' written responses for the requested one (1) area of concern.

Please contact Alex Hughes at (949)697-2539 if you have any questions or need additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Alex Hughes", written over a light blue grid background.

Alex Hughes
Pipeline Safety and Risk Mitigation Manager

CC:

Neena Master, SoCalGas

Wilson Lule, SED/GSRB

Kan-Wai Tong, SED/GSRB

Molla Mohammad Ali, SED/GSRB

Matthewson Epuna, SED/GSRB

Claudia Almengor, SED/GSRB

2022 SoCalGas Transmission Compressor Station Audit Response

Concern(s)

Maintenance and Operations: Gas Pipeline Maintenance (MO.GM)

Question Title, ID Valve Maintenance Transmission Lines, MO.GM.VALVEINSPECT. R

Question 10. Do records indicate proper inspection and partial operation of transmission line valves that may be required during an emergency as required and prompt remedial actions taken if necessary?

References 192.709(c) (192.745(a), 192.745(b))

Assets Covered SoCalGas' Main Office Inspection - Transmission (88388 (40A))

Issue Summary 49 CFR 192.745 (b); Each operator must take prompt remedial action to correct any valve found inoperable unless the operator designates an alternative valve.

Observed Discharge and Suction valves exercise at Kelso Compressor plant on 2/11/2022:

Discharge valve **235-58.79-2**, had a visible oil leak. Operator exercised the valve with some level of difficulty. During the exercise, SED observed valve fluid on the exterior of the valve body, and the operator was unable to operate the valve. SED reviewed past four-year maintenance cycle records and found the following:

1. The hydraulic leak was first noticed in 2018, on the work order (w/o) #659 8357, dated 1/24/2018.
2. A follow -up w/o # 6598347 was issued and completed on 1/26/2018. Review of the work order showed that the asset numbers on the discharge valve did not match. SCG explained that the staff worked hour was charged on a different station (North Needles) work order, but the work was done on Kelso Station.
3. W/O # 787-7809 indicated repair of hydraulic fluid leak, dated 2-16-2022. It showed that the upper and lower oil seals were replaced, tested, and the valve was returned to service.
4. SED is concerned that the valve inspection and maintenance records are reported on different station work orders.

Response:

SoCalGas agrees with the finding. This was a clerical error. Maximo work order #6598347 is not a follow up work order. It is the original work order for the North Needles valve inspections. The follow up note documenting that the valve had been repaired was added to the wrong work order, #6598347. The same personnel that maintain North Needles Station also maintain Kelso Station and the notes were inadvertently added to work order #6598347. The original Kelso valve inspection work order #6598357 has similar but different valve mileposts which led to the confusion. A separate follow up work order #7877809 was created to document the latest repairs.