



Lodi Gas Storage, L.L.C.
A Rockpoint Gas Storage Company
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October 26, 2023

Terence Eng, P.E.
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue, 2nd Floor
San Francisco, CA 94102-3298
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VIA ELECTRONIC MAIL

RE: General Order 112-F Inspection of Lodi Gas Storage's Damage Prevention Program

Dear Mr. Eng:

Lodi Gas Storage, L.L.C. (LGS) submits this written response to the Safety and Enforcement Division (SED) of the California Public Utilities Commission (Commission). On behalf of the SED, Wai Yin (Franky) Chan and Dylan Glass conducted a General Order 112-F inspection of LGS's Damage Prevention Program from July 31, 2023 through August 4, 2023. The inspection findings identified by SED were provided to LGS on September 26, 2023. LGS addresses the inspection findings as noted by SED in the "Post-Inspection Written Preliminary Findings" in the following enclosed documents:

- **Attachment #1** – LGS Responses to "Post-Inspection Written Preliminary Findings"
- **Attachment #2** – Excerpt from LGS Operations & Maintenance Manual Procedure 3.01 Damage Prevention Program highlighting revisions to address marking proposed excavation sites for straight pipeline sections

If you have any questions, or require more information, please contact me at greg.clark@rockpointgs.com or at (209) 368-9277.

Sincerely,



Gregory N. Clark
Senior Compliance Manager

Enclosures

cc: File #S3.03
C. Almengor (claudia.almengor@cpuc.ca.gov)
W. Chan (wai-yin.chan@cpuc.ca.gov)
D. Lee (dennis.lee@cpuc.ca.gov)
A. Anderson, M. Fournier, K. Peterson (via e-mail)

Attachment #1



LGS Responses to “Post-Inspection Written Preliminary Findings”



Post-Inspection Written Preliminary Findings

Concerns

1. Maintenance and Operations : ROW Markers, Patrols, Leakage Survey and Monitoring (MO.RW)

Placement of ROW Markers, MO.RW.ROWMARKER.O

Question 3. Are line markers placed and maintained as required?

References 192.707(a) (192.707(b), 192.707(c), 192.707(d))

SED has found concern in the distance between line markers while observing LGS's roadside markers in Acampo, in the location of the pipe along Acampo Rd., Acampo between [REDACTED] and just West of Acampo Rd. and May Rd. intersection. There is an approximate distance of 2500ft, as found from google earth, which may cause a chance for damage or interference to occur.

LGS Response:

Lodi Gas Storage endeavors to place and maintain line markers for its pipelines in accordance with 49 CFR 192.707. The distance between line markers in the pipeline section between [REDACTED] and just West of Acampo Rd. and May Rd. intersection shall be addressed.

2. Public Awareness and Damage Prevention : Damage Prevention (PD.DP) Construction Marking, PD.DP.EXCAVATEMARK.P

Question 3. Does the process require marking proposed excavation sites to CGA Best Practices or use more stringent and accurate requirements?

References 192.614(c)(5)

SED reviewed Lodi Gas Storage's Operation and Maintenance Manual Procedure 3.01 Damage Prevention Program and section 5.6.6 states that, "Mark on straight pipeline sections at intervals required by conditions of the site and job, but not to exceed 100 feet (30 meters) onshore." The 100 feet interval requirement in this section does not align with the best practice of 4 to 50 feet distance between marks in the Common Ground Alliance Best Practices Version 18.0. SED is concerned that the discrepancy could cause confusion to the Lodi Gas Storage Locate and Mark employees regarding the maximum allowable distance between marks.

LGS Response:

LGS has updated its Operations and Maintenance Manual Procedure 3.01 Damage Prevention Program to address marking at proposed excavation sites for straight pipeline sections. Please see Attachment #2.



**3. Public Awareness and Damage Prevention : Damage Prevention (PD.DP)
Damage Prevention Program, PD.DP.PDPROGRAM.R**

Question 7. Does the damage prevention program meet minimum requirements specified in 192.614(c)?

References 192.614(c)

SED reviewed Lodi Gas Storage's Locate and Mark records and did not find a response or notes for the Underground Service Alert ticket X133401789 with a work start date on 12/2/2021. According to Lodi Gas Storage, the excavator did not delineate the area for the excavation and the excavation never took place. SED recommends Lodi Gas Storage to include a response and adequate information for each one-call ticket in its locate and mark records to show the actions and communications with the excavator upon receiving a locate and mark request.

LGS Response:

Lodi Gas Storage shall consider SED's recommendation regarding records for one-call tickets.

Attachment #2



**Excerpt from LGS Operations and Maintenance Manual
highlighting revisions to address marking proposed excavation sites
for straight pipeline sections**

- 5.6.2 Locate and mark the pipeline in areas of conflict where excavation activities are observed, anticipated, or will occur as indicated by notification in accordance with Common Ground Alliance Best Practices and GC 4216.
- 5.6.3 Pipelines must be marked before dig ticket becomes valid, unless the notifying party agrees to extend this time, and before any excavation activities begin. Any agreement between parties shall be documented on the dig ticket.
- 5.6.4 Use temporary flags, stakes, or other more permanent marks, if the type and duration of activity so dictates. The minimum length of pipeline to be marked shall be as required by conditions of the site and job. Photos may be taken to assist in documentation. If practical, locate and mark pipelines when a requester's representative is present.
- 5.6.5 Bends and other changes of direction need to be marked so that the location of the pipe is clearly delineated.
- 5.6.6 Mark on straight pipeline sections at intervals required by conditions of the site and job, but not to exceed approximately 50 feet apart.
- 5.6.7 If an outside party is seen approaching or working over the Company's pipeline, immediately notify the excavator that a conflict exists and ask him to delay until the line is located and marked. If the excavator does not cooperate, emergency responders shall be notified.
- 5.6.8 Only a "qualified person" is allowed to conduct subsurface installation locating activities. The regulation defines "Qualified person" as a person who completes a safety training program that meets the requirements of 8 CCR 1509 (Injury Prevention Program) & meets the minimum training guidelines and practices of Common Ground Alliance current Best Practices. The company defines qualified person as a person who meets the requirements for locating and marking as specified in the company Operator Qualification Plan. [Ca. Gov. Code #4216.1]
- 5.6.9 LGS contract excavators must notify the pipeline operator or call 911 when the excavator discovers or causes damage to the pipeline installation. [Ca. Gov. Code #4216.1]