

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



November 16, 2023

GI-2023-07-LGS-37-14

Mathieu Fournier (Mathieu.fournier@rockpointgs.com)

Vice President, Operations
Lodi Gas Storage, L.L.C.
400 – 607 8th Ave SW
Calgary, AB T2P 0A7

SUBJECT: SED's Closure Letter for General Order 112-F Gas Inspection of Lodi Gas Storage's Damage Prevention Program

Dear Mr. Fournier,

The Safety and Enforcement Division (SED) of the California Public Utilities Commission reviewed Lodi Gas Storage Company's (LGS) response letter dated October 26, 2023, for the findings identified during the General Order 112-F inspection of LGS's Damage Prevention Program from July 31 to August 4, 2023.

A summary of the inspection findings documented by SED, LGS's response to our findings, and SED's evaluation of LGS's response taken for each identified Area of Concern is attached.

This letter serves as the official closure of the 2023 GO 112-F inspection of LGS's Damage Prevention Program and any matters that are being recommended for enforcement will be processed through the Commission's Citation Program or a formal proceeding.

Thank you for your cooperation in this inspection. If you have any questions, please contact Wai Yin (Franky) Chan at (415) 471-4306 or by email at wai-yin.chan@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Dennis Lee".

Dennis Lee, P.E.
Program and Project Supervisor
Gas Safety and Reliability Branch
Safety and Enforcement Division

Enclosure: Post-Inspection Written Preliminary Findings

cc: Andy Anderson, LGS (andy.anderson@rockpointgs.com)
Greg Clark, LGS Compliance (greg.clark@rockpointgs.com)
Terence Eng, SED
Claudia Almengor, SED

Post-Inspection Written Preliminary Findings

Dates of Inspection: 7/31/2023-8/4/2023

Operator: LODI GAS STORAGE, LLC

Operator ID: 31697 (primary)

Inspection Systems: LODI GAS STORAGE

Assets (Unit IDs) with results in this report: Lodi Gas Storage (86920)

System Type: GT

Inspection Name: 2023 Damage Prevention 31697 Lodi Gas Storage CPUC

Lead Inspector: Wai-Yin Chan

Operator Representative: Greg Clark

Unsatisfactory Results

No Preliminary Findings.

Concerns

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

Question Title, ID Placement of ROW Markers, MO.RW.ROWMARKER.O (also presented in: PD.RW)

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

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

Assets Covered Lodi Gas Storage (86920 (37))

Issue Summary 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's 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.

SED's Conclusion:

SED has reviewed the response from LGS and determined that the corrective actions articulated by LGS sufficiently address SED's concern.

Public Awareness and Damage Prevention : Damage Prevention (PD.DP)

Question Title, ID 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)

Assets Covered Lodi Gas Storage (86920 (37))

Issue Summary 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's 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.

SED's Conclusion:

SED has reviewed the response from LGS and determined that the corrective actions articulated by LGS sufficiently address SED's concern.

Question Title, ID 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)

Assets Covered Lodi Gas Storage (86920 (37))

Issue Summary 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's Response:

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

SED's Conclusion:

SED has reviewed the response from LGS and determined that the corrective actions articulated by LGS sufficiently address SED's concern.