



Alex Hughes
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October 27, 2023

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 Operation and Maintenance Inspection of Southern California Gas Company (SoCalGas)'s Honor Rancho Natural Gas Storage Field** (Inspection Unit) starting July 24 through July 28 of 2023 for calendar years 2019 through 2022. SED reviewed records and conducted field inspections of SoCalGas pipeline within the Inspection Unit.

SED's staff identified zero (0) violations of G.O.112-F, Reference Title 49 Code of Federal Regulations (CFR), Part 192, and one (1) area of concern. Below are SoCalGas' written responses.

Please contact Alex Hughes at (213)671-1344 if you have any questions or need additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Alex Hughes", with a long horizontal flourish extending to the right.

Alex Hughes
Pipeline Safety and Risk Mitigation Manager

CC:

Larry Andrews, SoCalGas
Mahmoud Intably, GSRB
Kan-Wai Tong, GSRB
Gordon Kuo, GSRB
Claudia Almengor, GSRB

2023 SoCalGas Honor Rancho Storage Audit Response

Concern:

Time-Dependent Threats: Atmospheric Corrosion (TD.ATM)

Question Title, ID	Atmospheric Corrosion Monitoring, TD.ATM.ATMCORRODEINSP.O
Question	5. Is pipe that is exposed to atmospheric corrosion protected?
References	192.481(b) (192.481(c), 192.479(a), 192.479(b), 192.479(c), 192.481(d), 192.9(f)(1), 192.453, 192.491)
Assets Covered	Honor Rancho (88720)
Issue Summary	<p>Result Issue Summary (required):</p> <p>Title 49 CFR, Part 192, §192.479(a) states in part:</p> <p><i>"Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere,", and</i></p> <p>Title 49 CFR, Part 192, §192.479(b) states,</p> <p><i>"Coating material must be suitable for the prevention of atmospheric corrosion."</i></p> <p>During the field inspection on 7/26/23, at HR-SE3-04.0A-P, SED observed signs of atmospheric corrosion on an above ground pipeline at the pipe elbow and at the soil-to-air interface, with visible damage to the pipe wrappings (deteriorated).</p> <p>SED recommends that SoCalGas takes the appropriate corrective action to clean and coat the pipe elbow and to re-wrap the pipe at the soil-to-air interface with suitable material to ensure compliance with Title 49 CFR, Part 192, §192.479(a)&(b).</p>

Response & Actions:

SoCalGas corrected the area in concern by cleaning, stripping and repainting the pipe and by re-wrapping the pipe at the pipe to soil interface. The Maximo work order documenting the completion of this work is #8417052.