

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



November 22, 2023

GI-2023-10-WGS-36-04-05-06

Mathieu Fournier, VP of Eng/Ops (Mathieu.Fournier@rockpointgs.com)
Wild Goose Gas Storage, LLC
400, 607 – 8th Avenue S.W.
Calgary, Alberta, Canada T2P 0A7

SUBJECT: General Order 112-F Inspection of Wild Goose Gas Storage's Emergency Response, Public Awareness, Anti-Drug, and Alcohol Misuse Prevention Program

Dear Mr. Fournier:

On behalf of the Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC), Wai Yin (Franky) Chan, Dylan Glass, and Julian Cornell conducted a General Order 112-F inspection of Wild Goose Gas Storage Company's (WGS) Emergency Response, Public Awareness, Anti-Drug, and Alcohol Misuse Prevention Program from October 30 to November 3, 2023.

SED staff noted one (1) area of concern which is described in the attached "Post-Inspection Written Preliminary Findings" report. The summary reflects only those records and pipeline facilities that SED inspected.

Within 30 days of your receipt of this letter, please provide a written response indicating the measures taken by WGS to address the concerns noted in the Summary.

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 "Terence Eng".

Terence Eng, P.E.
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division

Enclosure: Post-Inspection Written Findings

cc:

Andy Anderson, WGS (andy.anderson@rockpointgs.com)
Greg Clark, WGS (greg.clark@rockpointgs.com)
Harold Gold, WGS (harold.gold@rockpointgs.com)
Claudia Almengor, SED
Dennis Lee, SED

Post-Inspection Written Preliminary Findings

Dates of Inspection: 10/30/2023 – 11/03/2023

Operator: WILD GOOSE STORAGE LLC

Operator ID: 31287 (primary)

Inspection Systems: Anti-Drug and Alcohol Misuse Prevention Program

Assets (Unit IDs) with results in this report: Wild Goose Storage (88673)

System Type: DA

Inspection Name: 2023 Anti-Drug and Alcohol Misuse Plan 31287 WILD GOOSE STORAGE LLC CPUC GT

Lead Inspector: Wai-Yin Chan

Operator Representative: Greg Clark

Unsatisfactory Results

No Preliminary Findings.

Concerns

Drug and Alcohol : General Program Requirements (DA.GENERAL)

Question Title, ID Reporting of Annual D&A Test Results to PHMSA, DA.GENERAL.MISREPORTS.P

Question 7. Does the process ensure D&A MIS reports are submitted annually to PHMSA as required?

References 199.119(a) (199.3, 199.119(f), 199.229(a), 199.229(d), 40.26)

Assets Covered Wild Goose Storage (88673 (36))

Issue Summary SED reviewed Wild Goose Storage's (WGS) Anti-Drug and Alcohol Misuse Prevention Plan and section VII.6 states that:

"The Company will prepare and maintain the DOT Management Information System (MIS) report for its drug and alcohol testing program. This report will be submitted to PHMSA in accordance with annual submission requirements... The MIS report will be submitted electronically through the DAMIS portal on or before March 15th."

According to §199.119(a), each large operator (having more than 50 covered employees) is required to submit an annual Management Information System (MIS) report to PHMSA of its anti-drug testing, but each small operator (50 or fewer covered employees) is only required by notice from PHMSA to submit an annual MIS report. Because WGS is a small operator and is not required to submit an MIS report to PHMSA unless it receives a notice in the PHMSA Portal (<https://portal.phmsa.dot.gov/phmsaportalanding>), SED recommends

WGS to include clarification in its plan on the MIS report submission procedure for a small operator.

Post-Inspection Written Preliminary Findings

Dates of Inspection: 10/30/2023 – 11/03/2023

Operator: WILD GOOSE STORAGE LLC

Operator ID: 31287 (primary)

Inspection Systems: Emergency Plan and Public Awareness Program

Assets (Unit IDs) with results in this report: Wild Goose Storage (88673)

System Type: GT

Inspection Name: 2023 Emergency Plan and Public Awareness Program 31287
WILD GOOSE STORAGE LLC CPUC GT

Lead Inspector: Wai-Yin Chan

Operator Representative: Greg Clark

Unsatisfactory Results

No Preliminary Findings.

Concerns

No Preliminary Concerns.