

## PUBLIC UTILITIES COMMISSION

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July 28, 2021

GI-2021-05-WGS-36-08

Mathieu Fournier, VP of Eng/Ops  
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Via Email: [Mathieu.Fournier@rockpointgs.com](mailto:Mathieu.Fournier@rockpointgs.com)

SUBJECT: General Order 112 Transmission Integrity Management Program (TIMP) Inspection of Wild Goose Gas Storage

Dear Mr. Fournier:

On behalf of the Safety and Enforcement Division (SED) of the California Public Utilities Commission, Paul Penney and Andrew Kwan conducted a General Order 112-F inspection of the Wild Goose Gas Storage (WGS) TIMP from May 24-28, 2021. The inspection included a review of the TIMP plan as well as records associated TIMP Inspection Assistant (IA) question set.

SED's findings are noted in the Post-Inspection Written Preliminary Findings (Summary), which is enclosed with this letter.

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

If you have any questions, please feel free to contact Paul Penney at 415-703-1817.

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 Preliminary Findings

cc: Gary Theberge, WGS ([Gary.Theberge@rockpointgs.com](mailto:Gary.Theberge@rockpointgs.com))  
Greg Clark, WGS ([Greg.Clark@rockpointgs.com](mailto:Greg.Clark@rockpointgs.com))  
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# Post-Inspection Written Preliminary Findings

**Date of Briefing:** 05/28/2021  
**Dates of Inspection:** 5/24→5/28/21  
**Operator:** WILD GOOSE STORAGE LLC  
**Operator ID:** 31287 (primary)  
**Inspection Systems:** Wild Goose Storage Transmission System  
**Assets (Unit IDs) with results in this report:** WGS Transmission (88673)  
**System Type:** GT  
**Inspection Name:** (2021) Wild Goose Storage TIMP Audit  
**Lead Inspector:** Paul Penney  
**Operator Representative:** Gary Theberge, Greg Clark

## Unsatisfactory Results

### Assessment and Repair: In-Line Inspection (Smart Pigs) (AR.IL)

Question Title, ID IMP Assessment Methods, AR.IL.ASSESSMETHOD.R

Question 7. Do records demonstrate that the assessment methods shown in the baseline and/or continual assessment plan were appropriate for the pipeline specific integrity threats?

References 192.947(g) (192.919(b), 192.921(a), 192.937(c)) **192.917(b)**

Assets Covered WGS Transmission (WGS)

Issue Summary VIOLATION:

**192.917(b)** *Data gathering and integration.*

*To identify and evaluate the potential threats to a covered pipeline segment, an operator must gather and integrate existing data and information on the entire pipeline that could be relevant to the covered segment. In performing this data gathering and integration, an operator must follow the requirements in ASME/ANSI B31.8S, section 4. At a minimum, an operator must gather and evaluate the set of data specified in Appendix A to ASME/ANSI B31.8S, and consider both on the covered segment and similar non-covered segments, past incident history, corrosion control records, continuing surveillance records, patrolling records, maintenance history, internal inspection records and all other conditions specific to each pipeline.*

WGS needs to gather and integrate data from American Society of Mechanical Engineers (ASME) B31.8S, Appendix A for each threat identified in the appendix as specified in the code section quoted above. WGS failed to gather and evaluate the set of data specified in 192.917(b). Therefore, WGS is in violation of 49 CFR 192.917(b).

# Concerns

## Assessment and Repair: In-Line Inspection (Smart Pigs) (AR.IL)

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Assets Covered WGS Transmission (WGS)

Issue Summary Appendix H, Section 2.8 (Contracting Logistics):

**CONCERN:**

WGS's Integrity Management Plan, Appendix H: Inline Inspection Procedure, Section 2.8(e) discusses acceptance criteria for the ILI tool run and provides several example criteria.

To assure the survey acceptance criteria are fulfilled and documented, Gas Safety and Reliability Branch (GSRB) staff recommends that WGS should create a form for documenting the acceptance of an ILI run. See API 1163 (In-line Inspection System Qualification), Section 7.5.1 and Annex B.

## Assessment and Repair: Repair Criteria (HCA) (AR.RC)

Question Title, ID Definition of Discovery, AR.RC.DISCOVERY.P

Question 2. Does the integrity assessment process properly define discovery and the required time frame?

References 192.933(b)

Assets Covered WGS Transmission (WGS)

Issue Summary IMP, Section 5.4 defines discovery consistent with 192.933(b).

**CONCERN:**

Part 192.933(d)(3) states in part:

...(ii) A dent located between the 8 o'clock and 4 o'clock positions (upper 2/3 of the pipe) with a depth greater than 6% of the pipeline diameter (greater than 0.50 inches in depth for a pipeline diameter less than Nominal Pipe Size (NPS) 12), and engineering analyses of the dent demonstrate critical strain levels are not exceeded.

(iii) A dent with a depth greater than 2% of the pipeline's diameter (0.250 inches in depth for a pipeline diameter less than NPS 12) that affects pipe curvature at a girth weld or a longitudinal seam weld, and engineering analyses of the dent and girth or seam weld demonstrate critical strain levels are not exceeded. These analyses must consider weld properties.

WGS already includes a reference to ASME B31.8 2007 in its Integrity Management Plan, on pgs. 30-31. GSRB staff recommends WGS edit the reference for ASME B31.8-2007 to include Appendix R, which is the appendix for estimating critical strain.

## Assessment and Repair: Repair Methods and Practices (AR.RMP)

Question Title, ID Non-Destructive Testing of Pipeline for Cracking and/or SCC When Exposed for Repair, AR.RMP.CRACKNDT.P

Question 26. Does the process require that when a pipeline segment that meets the conditions for cracking and/or possible SCC is exposed (i.e., the coating is removed), an NDE method (e.g., MPI, UT) is employed to evaluate for cracking?

References 192.929(b) (ASME B31.8S-2004 Appendix A3.4)

Assets Covered WGS Transmission (WGS)

Issue Summary IMP, Appendix B.2 discusses the screening criteria.

**CONCERN:**

WGS should note in Appendix B.2 that the screening criteria identified in ASME B31.8S-2004, Appendix A3, for the High pH Stress Corrosion Cracking (SCC) threat is not absolute. These criteria do not account for approximately 25-35% of historical SCC failures. As noted in the National Association of Corrosion Engineers (NACE) RP0204-2004 (Stress Corrosion Cracking Direct Assessment Methodology), Section 1.2.1, "...It is recognized that these screening factors will identify a substantial portion of the susceptible locations, but not all of them."

Therefore, while all screening criteria listed in B31.8S-2004, Appendix A3.3 might not be met (i.e., Operating Stress > 60% SMYS, Operating Temperature > 100°F, etc.), GSRB staff recommends that WGS conduct magnetic particle inspections whenever digs that expose the transmission line pipe are done. GSRB staff recommends this be done on an opportunity basis when the transmission line pipe is exposed for other reasons. This will ensure a higher probability that high pH Stress Corrosion is found if SCC is found outside of the screening criteria identified in Section A3.3.

## Integrity Management: Continual Evaluation and Assessment (IM.CA)

Question Title, ID Waiver from Reassessment Interval in Limited Situations, IM.CA.REASSESSWAIVER.P

Question 9. Does the process include requirements for reassessment interval waivers (special permit per 190.341)?

References 192.943(a) (192.943(b))

Assets Covered WGS Transmission (WGS)

Issue Summary **CONCERN:**

WGS already includes waiver language in its Integrity Management Plan, Section 5.3.6, page 28. However, a waiver is now called a special permit and the process for submitting a waiver/ special permit is covered in 190.341.

GSRB staff recommends that WGS add a reference for Part 190.341 and include the special permit language to the IMP, section 5.3.6.