

10th St E Palmdale Incident Investigation Report

CPUC - SAFETY AND ENFORCEMENT DIVISION
GAS SAFETY AND RELIABILITY BRANCH

Event Date: March 29, 2024

DOT No. 1395201

CPUC SED No. G20240330-3681

CPUC Report Date:	June 2, 2025, Final
Investigators:	Randy Holter, Mahmoud Intably
Date incident reported to CPUC	March 30, 2024
Utility:	Southern California Gas Company (SoCalGas)
Date and Time of the Incident:	3/29/2024, 0800 Hours
Location of the Incident:	Palmdale , CA, Los Angeles County



California Public
Utilities Commission

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Executive Summary

Summary of Incident

On March 29, 2024, at approximately 0800 hours, Southern California Gas Company (SoCalGas) personnel responded to a third-party excavation incident at [REDACTED] 10th St E, Palmdale, CA. A third-party contractor's excavator equipment (backhoe) had struck SoCalGas' abandoned 1-inch by 5.5-inch-long branched steel service stub (1-inch stub), welded to the top of an operating SoCalGas buried pipe, causing a release of natural gas into the atmosphere.

The incident occurred during the City of Palmdale water project pipeline installation when third-party contractor, Patriot Pipeline Inc. (Patriot), a general engineering contractor for the Palmdale Water District, was installing a 25-inch water main.

Patriot struck SoCalGas' abandoned 1-inch stub at a depth of approximately 38-inches with a backhoe excavator bucket at [REDACTED] 10th St E, Palmdale, CA. The abandoned 1-inch stub, formerly part of a branched 1-inch lateral service pipe, was welded on top of SoCalGas' North Valley, Lancaster District supply line (SL32-60ST): an in-service 10-inch High Pressure Distribution Steel Main (10-inch HPDSM) pipe, segment ID #189, installed 1957.

When the Patriot backhoe excavating bucket struck the 1-inch stub, it caused an approximately 50% separation of the abandoned 1-inch stub from the 10-inch HPDSM pipe and resulted in a release of approximately 1,508 Million Cubic Feet (MMCF) of natural gas into the atmosphere. There were no service interruptions, no injuries or fatalities reported as a result of this incident. The incident was reported to both the Department of Transportation (DOT) (DOT #1395201& 1395351) and California Public Utilities Commission (CPUC) due to gas release and potential cost of repairs exceeding \$139,700.

SED's investigation found that the incident was caused by SoCalGas failing to locate and mark the 1-inch stub. SED found that SoCalGas did not include and identify the 1-inch stub on its GIS mapping system. SED also found that the SoCalGas qualified personnel assigned to locate and mark the Company underground surface installations were unaware of the 1-inch stub because it was not identified on the Company's GIS map records. Therefore, SED found that SoCalGas is in violation of General Order (GO) 112F, Reference Title 49 Code of Federal Regulations (49 CFR), Part 192, § 192.605(b)(3).

Incident Investigation

Summary of Incident and Investigation

On March 29, 2024, at approximately 0800 hours, SoCalGas personnel responded to a DOT reportable, third-party excavation incident at [REDACTED] 10th St E, Palmdale, CA. The incident occurred during Palmdale Water District's water project pipeline installation. Patriot, a third-party contractor working for the City of Palmdale, was installing a 25-inch water main in the street. Patriot's backhoe struck an abandoned 1-inch stub, welded on top of a SoCalGas 10-inch HPDSM pipe, causing a release of natural gas.

There were no service interruptions, no injuries or fatalities reported as the result of this incident.

This incident was reported to both DOT and CPUC due to the gas release and potential costs exceeding \$139,700.

SED's investigation found that the incident was caused by SoCalGas failing to locate and mark the 1-inch stub. SED found that SoCalGas did not include and identify the 1-inch stub on its GIS mapping system. SED also found that the SoCalGas qualified personnel assigned to locate and mark the Company underground surface installations were unaware of the 1-inch stub because it was not identified on the Company's GIS map records. Therefore, SED found that SoCalGas is in violation of GO 112F, 49 CFR, Part 192, § 192.605(b)(3).

SED finds that SoCalGas should improve its mapping and procedures to address locating and marking inactive subsurface installations that remain as a facility connected to active subsurface installation pipeline facilities left in operation when abandoning and disconnecting pipeline assets.

Fatalities / Injuries

No fatalities or injuries reported as the result of this incident.

Property Damage

There was no property damage reported due to the incident.

Utility Facilities Involved

SoCalGas' North Valley, Lancaster District main supply line, SL32-60ST: an in-service, 10-inch High Pressure Distribution Steel Main, segment ID #189, installed 1957; SoCalGas' abandoned 1-inch by 5.5-inch-long, steel, branched service stub.

Investigators

	Name	Title
1.	Randy Holter	SED, Senior Utilities Engineer Specialist
2.	Mahmoud Intably	SED, Program and Project Supervisor

Documents Reviewed

See Appendix B.

SED Investigation Process

Reporting Requirements

GO 112-F, CFR, Part 191, Section 191.5 requires that each operator give notice in accordance with paragraph (b) of this section of each incident as defined in § 191.3. However, Part 191, Section 191.3 defines an “incident” as “*An event that involves a release of gas from a pipeline (emphasis added), gas from an underground natural gas storage facility (UNGSF), liquefied natural gas, liquefied petroleum gas, refrigerant gas, or gas from an LNG facility, and that results in one or more of the following consequences: ...*”. Since this incident involved the release of gas and the estimated costs for repairs exceeding \$139,700, SoCalGas classified the March 29, 2024, incident as DOT reportable. This incident meets the DOT Reportable Incident requirement for reporting.

SED Investigation

The Gas Safety and Reliability Branch (GSRB) of SED began the investigation of this pipeline incident on March 30, 2024. On April 1, SUE-Specialist was not available due to State Holiday and the SED, Program and Project Supervisor (PPS) visited the incident site. The PPS met with SoCalGas’ representative took photos of the damaged 1-inch stub, the cutout section, the temporary bypass assembly, the stoppers (to isolate the damaged section), pressure control fittings (for bypass and to monitor the pressure in the pipeline), depth of cover of the pipeline (29-30 inches), clearance between the new water main and SoCalGas pipeline (3 ft and 11 inches), the 1-inch stub (5.5 inches in length), the abandoned service line, pipeline markers, the backhoe, and the general area where the incident occurred. On April 2, 2024, PPS assigned this incident to a Senior Utilities Engineer-Specialist (SUE-Specialist) to lead the investigation. SED updated Pipeline Safety Hazardous Material (PHMSA) on its investigation and prepared/submitted several data requests to SoCalGas.

SED’s investigation of this incident involved interviews with witnesses, SoCalGas’ relevant personnel including SoCalGas’ stand-by personnel. SED reviewed SoCalGas’s USA ticket reports, pertinent SoCalGas employee training records, SoCalGas’ Operator Qualification records, and related operation and maintenance Gas Standards and Procedures.

On April 19, 2024, SED conducted an over the telephone interview with SoCalGas’ stand-by personnel.

On June 26, 2024, SED conducted an over the telephone interview with Patriot’s superintendent on site at time of incident.

The purpose of this investigation was to determine whether there were probable violations of GO 112-F CFR Part 192, that may have caused or contributed to the incident. Furthermore, SED was interested in determining if SoCalGas was implementing corrective actions to prevent similar incidents in the future.

Incident Description

On March 29, 2024, at approximately 0800 hours, a third-party contractor, Patriot struck an abandoned 1-inch stub at a depth of approximately 38 inches, that was welded on top of a SoCalGas' 10-inch HPDSM pipe, identified as SL32-60ST at [REDACTED] 10th St E, Palmdale, CA.

The impact of Patriot's backhoe excavator bucket caused an approximately 50% separation of the abandoned 1-inch stub from the 10-inch HPDSM pipe and resulted in the release of approximately 1,508 MMCF of natural gas into the atmosphere. There were no service interruptions, no injuries or fatalities reported as a result of this incident. The incident was reported to both the DOT (DOT #1395201& 1395351) and CPUC due to gas release and potential cost of repairs exceeding \$139,700.

Patriot was excavating parallel in the street, alongside the existing 10-inch HPDSM pipe to install a new 25-inch water main for Palmdale Water District and had a valid USA ticket #B240650947G4UY0 at the time of the incident.

SoCalGas records show active USA ticket A240650046G27T, stating SoCalGas required Patriot to conduct its work under code 31, "31: Requires stand-by" (per SoCalGas GS 184.0200; 4.10. Electronic Positive Response Codes (EPR Codes). Code 31 states SoCalGas requires a representative to be on site while the excavation is taking place - providing qualified field staff (stand-by). SoCalGas provided a stand-by representative as explained in the Chronology of Incident Investigation Activities report section, below.

On March 29, 2024, SoCalGas' Emergency Crews (crew) arrived on the scene at approximately 0845 hours to assess the damage, to plan to isolate the damaged section of SoCalGas' HPDSM pipe, and to bring the equipment/materials needed to make a permanent repair.

On March 30, 2024, SoCalGas' crew installed a pressure control fitting and stopper to isolate the damaged section of SoCalGas' 10-inch HPDSM pipe to stop the flow of gas and at approximately 2116 hours the SoCalGas' crews had the gas flow under control. SoCalGas' crews exposed the damaged section of the 10-inch HPDSM pipe and followed SoCalGas' Gas Standards to make a permanent repair by cutting out the damaged section and installing a new section of a 10-inch steel pipe.



Figure 1. Pressure control fittings and stopper



Figure 2. Temporary bypass pipeline

On March 30, 2024, at approximately 0845 hours, SoCalGas' crew completed the permeant repair, cleared the stoppers and returned the 10-inch HPDSM pipe back to operating in service (gas flow in the newly installed section).

Chronology of Incident Investigation Activities

This section provides a chronology of the investigative activities undertaken after the incident occurred on 3/29/2024 and reported to CPUC on 3/30/2024.

March 29, 2024

On Friday, March 29, 2024, at approximately 0800 hours, SoCalGas personnel responded to a DOT reportable, third-party excavation incident at [REDACTED] 10th St E, Palmdale, CA. The incident occurred during Palmdale Water District's water pipeline project installation. Patriot, a third-party contractor for the City of Palmdale, was excavating trench and installing a 25-inch water main in the street parallel to an existing sub-surface SoCalGas 10-inch HPDSM pipe. In the course of this work, Patriot's excavating equipment struck a SoCalGas 1-inch stub that was an abandoned branched lateral pipe welded on top of SoCalGas' 10-inch HPDSM pipe, SL32-60ST.

March 30, 2024

On Saturday, March 30, 2024, at approximately 1123 hours, SoCalGas' Watch Desk notified the CPUC Webmaster Incident Notification Portal regarding a third-party excavation incident at [REDACTED] 10th St E, Palmdale, CA.

At approximately 1236 hours, SoCalGas incident dispatch notified the Gas Safety and Reliability Branch (GSRB) by email regarding a third-party excavation incident at [REDACTED] 10th St E, Palmdale, CA. The dispatch noted that SoCalGas responded to an excavation incident and that a third-party contractor struck a 10-inch HPDSM pipe causing a release of natural gas into the atmosphere. SoCalGas crews were currently working on controlling the release of natural gas. No injuries or fatalities resulted from this incident. SoCalGas stated that this incident was reported to the DOT and CPUC due to costs associated with the incident potentially exceeding \$139,700.

SED contacted SoCalGas by email requesting further data regarding the incident and a request to visit the incident site as soon as possible.

March 31, 2024

SED contacted SoCalGas by email requesting additional data regarding the incident and a request to visit the incident site as soon as possible.

April 1, 2024

April 1, 2024, is a State of California holiday, Cesar Chavez Day Holiday

On April 1, SUE-Specialist was not available due to the State Holiday and the SED Program and Project Supervisor visited the incident site with a SoCalGas Pipeline Safety and Compliance Advisor (PSCA).

On April 1, 2024, at approximately 1000 hours, SED arrived at the incident site, met with SoCalGas' representatives, took photos of the damaged 1-inch stub, the cut out section of segment ID #189, the temporary bypass assembly, the stoppers (to isolate the damaged section), pressure control fittings (for bypass and to monitor the pressure in the 10-inch HPDSM pipe, the depth of cover of the 10-

inch HPDSM pipe at the incident location (29-30 inches), clearance between the newly installed water main and SoCalGas' 10-inch HPDSM pipe (3 ft & 11-inches), the abandoned SoCalGas service line, the pipeline markers, Patriot's backhoe, and the general area where the incident occurred. In addition, on April 1, 2024, at approximately 1900 hours, SoCalGas' crew completed the work order.



Figure 3. New section of 10-inch HPDSM pipe; replaced steel pipe with permanent repair



Figure 3. Damaged 1-inch stub "abandoned service tee"

April 2, 2024

On April 2, 2024, A Senior Utilities Engineer-Specialist (SUE-Specialist) was assigned the role of lead investigator. SED prepared and submitted several data requests to SoCalGas.

April 5, 2024

SoCalGas submitted data response to SED March 31, 2024, data request. SoCalGas response to SED question 2 is as follows:

2. Date the T was abandoned and the method of abandonment.

- a. SoCalGas cannot locate any service history regarding abandonment. Abandonment method
- Tee was capped and abandoned.

SoCalGas refers to the T (stub) as “abandoned”. SED notes that the stub, when it was struck, was not *disconnected from all sources and supplies of gas* per 49 CFR, Part 192, § 192.727 Abandonment or deactivation of facilities because the stub was connected to the active the 10-inch HPDSM pipe and both carried natural gas at the time of the incident.

April 19, 2024

On April 19, 2024, 0700 hours, SED investigators interviewed SoCalGas’ qualified stand-by employee (Stand-by-29), over the telephone. According to Stand-by-29, he was guiding the third-party contractor, Patriot, per USA ticket A240650046G27T. SoCalGas procedures required Patriot to conduct its work under code 31, “31: Requires stand-by” (per SoCalGas GS 184.0200; 4.10. Electronic Positive Response Codes (EPR Codes). Code 31 required that Stand-by-29 be on site while the excavation was taking place A. Stand-by-29 had marked out the SoCalGas underground 10-inch HPDSM pipe as high priority facilities and confirmed with Patriot that the excavation area was within 10-foot of the high priority substructure(s) and that excavation a stand-by was required. Patriot was excavating a 25-inch water main pipeline trench parallel to the SoCalGas 10-inch HPDSM pipe in the street. Stand-by-29 confirmed that the appropriate utility location markings were accurately completed and confirmed the markings before Patriot excavation crews began to excavate the third-party trench. SED reviewed USA service records which showed the tickets were active for the excavation dates.

Stand-by-29 stated that Patriot’s crew used hand tools to expose SoCalGas’ 10-inch HPDSM pipe when the backhoe excavator bucket came within 24-inches of the SoCalGas pipe. Patriot crews switched to hand tools and located the 10-inch HPDSM pipe by excavating in the soil and exposing it. Once the 10-inch HPDSM pipe was exposed, Patriot switched back to the backhoe to excavate benching the soil around the existing SoCalGas pipe. This excavation occurred on March 26, 2024, three days before the abandoned 1-inch stub was struck by Patriot crews. In the workdays between, Patriot crews had bench-excavated parallel to the SoCalGas 10-inch HPDSM pipe, installed 25-inch water main, backfilled and shaded sand over their pipe installation.

SoCalGas Stand-by-29 stated that he was aware of a 1-inch abandoned steel service line lateral across the street and there might be a matching stub (or “abandoned service tee” was part of the same abandoned gas service line) on March 28, 2024, as the abandoned lines were struck by the Patriot backhoe at other locations in the street. Stand-by-29 did not see any 1-inch stub noted on the SoCalGas GIS map plan. In the interview, Stand-by-29 stated that he had a discussion with Patriot on March 28, 2024, regarding the abandoned lateral and the possible existence of a matching 1-inch stub on the 10-inch HPDSM pipe. Patriot attempted to locate the lateral 1-inch stub on the 10-inch HPDSM pipe but was not able to locate it after several potholes. Patriot did locate another abandoned service stub approximately ten feet north of the abandoned lateral steel service lines, separated approximately 10 feet across the street. This resulted in Patriot using a backhoe on March 29, 2024, to bench above the 10-inch HPDSM pipe and striking and damaging the abandoned SoCalGas 1-inch steel stub.

SED reviewed the Stand-by-29 timesheet log records for March 29, 2024 [Appendix B.12; B.12] for the SoCalGas stand-by personnel and found that the interviewee (same person as Stand-by-29) was present at 10-inch HPDSM pipe incident location, prior to and at the time of the excavation incident. In addition, Stand-by-29 was tested under the post-incident drug and alcohol testing requirements of DOT's Drug and Alcohol testing requirements, and the test result was negative (pass) [B.13]. Furthermore, Stand-by-29 was qualified to perform the stand-by covered task and after the incident, Stand-by-29 completed the re-qualification of the stand-by covered task.

SoCalGas records showed that the 10-inch HPDSM pipe, segment ID #189 was installed on July 1, 1957, at a depth of 38 inches, in Class 3 location, carbon steel with specification – API5L, wall thickness -0.250 inches, Specified Minimum Yield Strength of 35,000 psi, seam type of EFW/ERW/SMLS, coal tar coating, with MAOP of 400 psig and MOP of 380 psig. SoCalGas GIS map records do not show any graphic representations of a 1-inch stub "T" on the 10-inch HPDSM pipe, SL32-60ST.

April 29, 2024

SoCalGas submitted GSRB preset data request by email and DOT Form PHMSA 7100.2 No. 20240051-39501 with an estimate cost to repair of \$9,603,050. SoCalGas stated that the DOT 7100.2 Original/Final Report is being provided in lieu of the CPUC Final 420 Report.

May 3, 2024

PHMSA responded with an email attachment to SoCalGas' 4/29/2024 submittal of DOT Form PHMSA 7100.2 No. 20240051-39501 with comments attached to document.

May 23, 2024

SED provided an email status updated to PHMSA for DOT Report - [REDACTED] 10th St E , Palmdale, Los Angeles DOT#20240326-17080.

June 24, 2024

SoCalGas submitted an email supplemental DOT Form PHMSA 7100.2 No. 20240051-39501, stating that the DOT 7100.2 Original/Final Report is being provided in lieu of the CPUC Final 420 Report.

June 26, 2024

SED conducted an over the telephone interview with Patriot's superintendent on site at time of incident. The superintendent had also been in communication with SoCalGas Stand-by-29 prior to the incident and on March 26, 2024. In the interview, Patriot's superintendent stated that he had a discussion with SoCalGas' Stand-by-29 on March 28, 2024, regarding the abandoned lateral and the possible existence of a matching 1-inch stub on the 10-inch HPDSM pipe. Patriot's superintendent stated he attempted to locate the lateral 1-inch stub "T" on the 10-inch HPDSM pipe but was not able to locate it after several potholes and there was no note of it on the SoCalGas plans. Patriot did locate another abandoned service stub approximately ten feet north of the abandoned lateral steel service lines, separated approximately 10 feet across the street. Because of this, Patriot felt clear to carefully using a backhoe on March 29, 2024, with a spotter from his crew.

July 1, 2024

PHMSA requested by email for SED to confer with SoCalGas on unanswered Form PHMSA 7100.2 concerns. The concerns were that SoCalGas failed to give additional information in the narrative; SoCalGas changed the volume released, and the total costs were not properly calculated by the PHMSA Portal.

July 13, 2024

SED conducted phone conference to address PHMSA comments on DOT Form PHMSA 7100.2 form regarding adjusted costs of incident. SoCalGas states it is conferring with engineering, operations and legal on actual costs to be determined.

July 22, 2024

SED submitted data request two (DR-02) to SoCalGas to provide verification for USA, active underground ticket on date of event, March 29, 2024, for this incident event, and a list of people on standby for this same active USA ticket.

September 12, 2024

SED submitted data request two (DR-02.1) correction for to SoCalGas to provide verification for USA, active underground ticket on date of event, March 29, 2024, USA active underground ticket for this incident event referenced as “A240650046” on B24065094G4UY page 4/4)

September 19, 2024

SoCalGas provided verification (DR-02.1) for USA, active underground ticket on date of event, March 29, 2024, for this incident, USA active underground ticket for this incident event referenced as “A240650046”

SED verified and reviewed with SoCalGas staff, the GIS map document in 10th St E, Palmdale where the 1-inch stub on the SL32-60ST, 10-inch HPDSM pipe was struck by Patriot. The map did not show the 1-inch stub on the 10-inch HPDSM pipe.

September 20, 2024

SoCalGas submitted DOT Form PHMSA 7100.2 7100 marked as Supplemental and Final. SED forwards Supplemental and Final SoCalGas DOT Form PHMSA 7100.2 7100 to PHMSA.

September 26, 2024

SED requested SoCalGas submitted a stand-by interview question validation form for Stand-by-29's review and confirmation with his supervisor.

November 4, 2024

SED requested DR-04 for Stand-by-29's drug and alcohol records for the incident; and requested Level 3 DOT incident clarification.

December 26, 2024

SoCalGas submitted DR-05 response to Stand-by-29 drug and alcohol records request.

April 4, 2025

SoCalGas provided interview clarification sheets from Stand-by-29; and DR-05 response to Stand-by-29 drug and alcohol records.

April 4, 2025

SoCalGas provided DR-06 incident Stand-by-29's record of daily work log at the incident site.

Findings and Corrective Actions

SED's Code Evaluation for SoCalGas Procedures:

Pertaining to SoCalGas, GO 112-F, 49 CFR, Part 192, §192.605(a) states:

"General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted."

49 CFR, Part 192, § 192.3 Definitions, states, in part that "abandoned":

"... means permanently removed from service."

Additionally, 49 CFR, Part 192, § 192.727 Abandonment or deactivation of facilities.

- (a) *Each operator shall conduct abandonment or deactivation of pipelines in accordance with the requirements of this section.*
- (b) *Each pipeline abandoned in place must be disconnected from all sources and supplies of gas; purged of gas....*
- (c) *Except for service lines, each inactive pipeline that is not being maintained under this part must be disconnected from all sources and supplies of gas....*

SoCalGas procedures for abandonment of service lines, GS 184.0080 – Abandonment of Gas Services and Repairs/Abandonments of Gas Light Tap Assemblies states in part:

4.1. Abandonment of Gas Service Lines

...

4.1.3.1. *Cut the service, leaving a stub no longer than 6-inches and remove a minimum of 1-foot of service pipe between the service and stub.*

SoCalGas' procedures, Gas Standard (GS) 184.0085 – Abandonment or Inactivation of Gas Distribution Pipelines, 3. Definitions, states, in part:

3.1. Abandoned Pipe – A pipe that has been physically separated from its source of gas and is no longer maintained under the requirements of 49 CFR Part 192).

On April 5, 2024, SoCalGas submitted a data response to SED March 31, 2024, data request, question 2 is as follows:

2. Date the “T” [stub] was abandoned and the method of abandonment?
 - a. SoCalGas cannot locate any service history regarding abandonment. Abandonment method – Tee [stub] was capped and abandoned.

SoCalGas qualified the 1-inch stub as “abandoned”

During SED’s field visit to the incident site, investigators observed the damaged 1-inch stub that was struck by Patriot. Investigators measured each part of the 1-inch stub; the cut and capped riser, and the branched and capped “T” (see Figure 3.). SED found that the 1-inch stub had been disconnected from the service line and remained connected to the 10-inch HPDSM pipe until it was struck by Patriot. SED observed that the 1-inch stub had gas in it due to the rupture and release of gas occurring in the section of the stub pipeline.

SoCalGas procedure 184.0200, Underground Service Alert and Temporary Marking; 4.6. Temporary Marking of Company Subsurface Installations concurs with the State’s Government Code where it states:

4.6.23. Qualified employees on a Company Distribution Crew or Distribution Contractor Crew must locate and mark the Company Distribution subsurface installations in conflict with their work

4.6.23.2. This satisfies CA Code 4216.3(a)(1)(A)(ii) locate requirements, to the extent and degree of accuracy that the information is available, provide information to an excavator where the operator’s active or inactive subsurface installations are located.

SED’s review of SoCalGas’ GIS map found that the records do not show the 1-inch stub at the incident location.

49 CFR 192, § 192.605 Procedural manual for operations, maintenance, and emergencies. States, in part

(b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.

(3) Making construction records, maps, and operating history available to appropriate operating personnel.

SoCalGas’ employee, Stand-by-29, stated he was not aware of the 1-inch stub because of its absence on the SoCalGas GIS map. Because he was unaware of the buried 1-inch stub, Stand-by-29 did not provide guidance to Patriot’s crews where to use hand digging tools across the entire tolerance zone to expose SoCalGas’ 1-inch stub.

SED’s Findings

Finding No. 1

SED determined that SoCalGas misidentified the 1-inch steel stub “T” subsurface installation as “abandoned” at an unknown prior date and considered it to be a “capped and abandoned T”. **The evidence shows that** the 1-inch stub was not physically disconnected from the source of gas, in this case the 10-inch HPDSM pipe.

Finding No. 2

SED found that SoCalGas did not include and identify the 1-inch stub on its GIS mapping system. SED found that the SoCalGas qualified personnel assigned to locate and mark the Company underground surface installations were unaware of the 1-inch stub because it was not identified on its GIS map records. SED found that the 1-inch stub was not marked on the surface and Patriot was unaware of the stub when they struck it with their backhoe because locate and mark personnel were not provided with the appropriate map records. Therefore, SED found that SoCalGas is in violation of GO 112F, 49 CFR, Part 192, § 192.605(b)(3).

SED's Recommendations

1. SoCalGas should take the appropriate steps to address the SED Finding 1. SoCalGas should update its records and procedures to appropriately classify the subsurface installations according to their status of either connection to active subsurface installations and carrying natural gas [inactive subsurface installations] or those that may be classified as “abandoned” according to GO 112F, 49 CFR 192.3 Definitions.
2. SoCalGas should take the appropriate steps to address the SED Finding 2. SoCalGas should incorporate the “inactive subsurface installations” to be shown graphically on its GIS mapping and recording of as-built drawings when disconnecting and abandoned service facilities.

SED's Observations

This section details two (2) observations SED made over the course of the investigation. SED will follow-up and monitor the progress of SoCalGas' proposed corrective actions.

Observation 1:

Following the incident, SoCalGas conducted a drug and alcohol test on the SoCalGas employee Stand-by-29 per SoCalGas gas procedures.

Observation 2:

SoCalGas conducted training Hands-on training with experience for requalification, as both are preferred for learning comprehension and retainment for receiving and safe unloading training.

SoCalGas's Corrective Actions

Action 1:

SoCalGas conducted a drug and alcohol test on SoCalGas' employees, Stand-by-29, per SoCalGas procedures.

Action 2

SoCalGas conducted employee Stand-by-29 training Hands-on training with experience for requalification, as both are preferred for learning comprehension and retention for receiving and safe unloading training.

Action 3

SoCalGas is reviewing SED recommendations 1, and 2 to evaluate implementation and improvement into its operation and maintenance mapping and records procedures.

Third-Party Corrective Actions

Patriot Pipeline Inc.:

California Government Code (CGC) 4216 (a)(1) states:

"Except as provided in paragraph (2), if an excavation is within the tolerance zone of a subsurface installation, the excavator shall determine the exact location of the subsurface installations in conflict with the excavation using hand tools before using any power-driven excavation or boring equipment within the tolerance zone of the subsurface installations. In all cases the excavator shall use reasonable care to prevent damaging subsurface installations."

Patriot was not aware of the existence of the 1-inch stub (subsurface installation) in conflict with excavation to determine the 1-inch stub's exact location before using power-driven equipment within the tolerance zone. In addition, based on the information provided by SoCalGas, Patriot, Inc., used reasonable care to prevent damaging subsurface installations. Therefore, SED did not find any probable violation of CGC 4216(a)(1) by Patriot Pipeline Inc.

Conclusion

Based on the investigation, SED determined that the incident occurred when a third-party excavator struck a SoCalGas 1-inch stub connected to a 10-inch HPDSM pipe, while benching with excavation equipment. SED determined that SoCalGas misidentified the 1-inch steel stub “T” subsurface installation as “abandoned” at an unknown prior date and considered it to be a “capped and abandoned T”. **The evidence shows that** the 1-inch stub was not physically disconnected from the source of gas, in this case the 10-inch HPDSM pipe.

SED also found that SoCalGas did not include and identify the 1-inch stub on its GIS mapping system. SED found that the SoCalGas qualified personnel assigned to locate and mark the Company underground surface installations were unaware of the 1-inch stub because it was not identified on its GIS map records. SED found that the 1-inch stub was not marked on the surface and Patriot was unaware of the stub when they struck it with their backhoe because locate and mark personnel were not provided with the appropriate map records. Therefore, SED found that SoCalGas is in violation of GO 112F, 49 CFR, Part 192, § 192.605(b)(3).

SED finds that SoCalGas should firstly update its records and procedures to appropriately classify the subsurface installations according to their status of either connection to active subsurface installations and carrying natural gas [inactive subsurface installations] or those that may be classified as “abandoned” according to GO 112F, 49 CFR 192.3 Definitions. SoCalGas should secondly incorporate the “inactive subsurface installations” to be shown graphically on its GIS mapping and recording of as-built drawings when disconnecting and abandoned service facilities.

Appendices

Appendix A: Glossary of terms

ACRONYM/ABBREVIATION	DEFINITION
AOC	Abnormal Operating Conditions
CFR	Title 49 - Code of Federal Regulations
DFM	Distribution Feeder Main
GO	General Order – Calif. Public Utility Commish.
GSRB	Gas Safety and Reliability Branch
HPDSM	High Pressure Distribution Steel Main
MP	Mile Point
OQ	Operator Qualification
SoCalGas	Southern California Gas Company
PHMSA	Pipeline & Hazardous Materials Safety Administration
Patriot	Patriot Pipeline Inc.
SED	Safety and Enforcement Division
DOT	Department of Transportation
PSCA	Pipeline Safety and Compliance Advisor

Appendix B: Documents Reviewed

1.	SoCalGas USRB Gas Incident Report to SED, GSRB 03/29/2024
2.	SoCalGas CPUC RGLI-420 Final Filing, GSRB 4/20/2024
3.	SoCalGas PHMSA 7100.02 Filing Form, 9/20/2024
4.	SED Site Area Pictures, 4/1/2024
5.	Interview report with SoCalGas stand-by, Stand-by-29, 4/19/2024
6.	Interview report with Patriot – 3 rd party contractor, SoCalGas, 6/26/204
7.	SoCalGas's Response to SED's Data Requests, 3/29/24-4/4/25
8.	SoCalGas' follow up validation of SED's interview answers 9/26/24
9.	SoCalGas Gas Standard procedures, Prevention of Excavation Damage to Company Subsurface Installations, GS184.09
10.	SoCalGas Gas Standard procedures, Underground Service Alert and Temporary Marking, GS184.02
11.	SoCalGas incident site Gas Asset Map
12.	SoCalGas Timesheet Report [Stand-by-29] - 3/26/2024 - 3/30/2024
13.	SoCalGas Drug – Alcohol Test for [Stand-by-29] - 3/26/2024 - 3/30/2024

Appendix C: Interviews

On April 19, 2024, 0700 hours, SED interviewed SoCalGas' stand-by employee, Stand-by-29, over the telephone. According to SoCalGas' Stand-by-29 employee, he was guiding the third-party contractor, Patriot, per USA ticket A240650046G27T. Patriot was excavating a 25-inch water main pipeline trench parallel to the SoCalGas 10-inch HPDSM pipe in the street. The Stand-by-29 confirmed the appropriate utility location markings were accurately completed and confirmed them before Patriot excavation crews began to excavate the third-party trench.

Stand-by-29 stated Patriot's crews used hand tools to expose SoCalGas' 10-inch HPDSM pipe when the backhoe excavator bucket approached within 24-inches of SoCalGas' 10-inch HPDSM pipe. Stand-by-29 stated Patriot crews switched to hand tools and located the pipe by excavating a bench in the soil and exposed the 10-inch HPDSM pipe. Once the 10-inch HPDSM pipe was exposed, Patriot switched back to the backhoe to excavate.

Stand-by-29 stated that he was aware of an abandoned gas service line because the Patriot operators had found them when they were excavating across the street. The SoCalGas map shows a separate and parallel SoCalGas main line, approximately 20 feet away which provides service connections to the abandoned 10-inch HPDSM pipe services.

Stand-by-29 stated that the 1-inch stub on the 10-inch HPDSM pipe was not located because the SoCalGas GIS plans do not show it on the map.

On June 29, 2024, 1440-hours, SED interviewed the third-party contractor Patriot, who struck the SoCalGas 1-inch stub with the backhoe excavator bucket. Patriot stated they were operating in the tolerance zone without guidance from the SoCalGas stand-by because they thought they were clear of damage due to a pothole locating the 10-inch HPDSM pipe less than 10-feet away and locating a different service stub 10 feet away. Patriot crews were not aware of the abandoned 1-inch stub location when they used the hand tools nor when they were using the backhoe to excavate.



6/2/2025