STATE OF CALIFORNIA Gavin Newsom, *Governor*

PUBLIC UTILITIES COMMISSION

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October 13, 2025 GI-2025-05-WGS-36-08

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

Via Email: Mathieu.Fournier@rockpointgs.com

SUBJECT: General Order 112-F 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 Kai Cheung conducted a General Order 112-F inspection of the Wild Goose Gas Storage (WGS) TIMP from May 19-23, 2025, & July 18, 2025. The inspection included a review of the TIMP plan as well as records associated with the TIMP Inspection Assistant (IA) question set.

SED identified 2 violations and 18 concerns which are described in the "Post-Inspection Written Preliminary Findings". 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 two violations and eighteen concerns noted in the Summary.

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

Sincerely,

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

Enclosure: Post-Inspection Written Preliminary Findings

cc:

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Post-Inspection Written Preliminary Findings

Dates of Inspection: May 19-23, 2025 & July 18, 2025
Operator: WILD GOOSE STORAGE LLC
Operator ID: 31287 (primary)
Inspection Systems: The entire transmission system
Assets (Unit IDs) with results in this report: All Transmission Assets in WGS System
System Type: GT
Inspection Name: (2025) Wild Goose Storage TIMP Audit
Lead Inspector: Paul Penney
Operator Representative: Greg Clark, et all

Unsatisfactory Results

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

Unsat #1:

Question Title, ID	Validation of ILI Results, AR.IL.ILIVALIDATE.R
Question	9. Do records demonstrate that the operator has validated ILI assessment results per their process?
References	192.947 (192.921(a)(1), 192.493)
Assets Covered	All Transmission Assets in WGS (AllTrans)
Issue Summary	The WGS TIMP procedure incorporates API 1163, which is incorporated by reference into 192.493. WGS provided the dig results from "Integrity Inspections" (A contractor used to dig the anomaly) per their process identified in AR.IL.ILIVALIDATE.P in this IA. The dig report was provided in WGS response to DR09. SED reviewed the report from Integrity Inspections. It is unclear from this report how the inspection results were used to validate the ILI inspection done in 2021. According to WGS process, API Standard 1163, section 8.2, Figure 6 is used to validate inspection results. Figure 6 is a flow chart that provides different levels of verification to follow when validating the inspection results. However, WGS provided no records showing how Figure 6 was used to validate the results. 192.947(d) states: *(d) Documents to support any decision, analysis and process developed and used to implement and evaluate each element of the baseline assessment plan and integrity*

management program. Documents include those developed and used in support of any identification, calculation, amendment, modification, justification, deviation and determination made, and any action taken to implement and evaluate any of the program elements;

WGS is in violation of 192.947(d) for failure to provide records showing how WGS followed its process in validating the ILI inspection results from 2021 as requested in DR09.

Integrity Management : Preventive and Mitigative Measures (IM.PM)

Unsat #2:

Question Title, ID P&M Measures - General Requirements, IM.PM.PMMGENERAL.R

Question 2. Do records demonstrate that additional measures have been identified and implemented (or scheduled) beyond those already required by Part 192 to prevent a pipeline failure and to mitigate the consequences of a pipeline failure in an HCA?

References 192.947 (192.935(a), 192.935(f))

Assets Covered All Transmission Assets in WGS (AllTrans)

Issue Summary WGS states in its response to DR34: *"No additional measures have been identified and implemented beyond what has already been provided for part 192."*

Part 192.935(a) requires:

An operator must take additional measures beyond those already required by this part to prevent a pipeline failure and to mitigate the consequences of a pipeline failure in a high consequence area (emphasis added). *Such additional measures must be based on the risk analyses required by § 192.917. Measures that operators must consider in the analysis, if necessary, to prevent or mitigate the consequences of a pipeline failure include, but are not limited to:*

WGS is in violation of 192.935(a) for not taking additional measures as required by 192.935(a) above, and base those measures on the risk analysis required by 192.917.

Concerns

Assessment and Repair : Repair Criteria (O&M) (AR.RCOM)

Concern #1:

Question Title, ID Repair Criteria in Non-Covered Segments, AR.RCOM.NONCOVERED.P

Question 1. Does the integrity assessment and maintenance processes include adequate criteria for determining the need for, and timeliness of, pipeline defect repairs in non-covered segments?

References 192.485(a) (192.485(b), 192.485(c), 192.703(b), 192.710, 192.711, 192.713, 192.714)

Assets Covered All Transmission Assets in WGS (AllTrans)

Issue Summary SED reviewed the WGS TIMP and O&M Procedures. WGS covers the above referenced codes in sections 2.2.4 in the TIMP and O&M procedures, Section 3.13.

The WGS TIMP and O&M plans currently do not incorporate language from PHMSA Amendment 192-125, effective July 1, 2020. The Amendment includes many new requirements, including 192.710 (Assessments in non-covered segments) and 192.711 (General requirements for repair procedures in covered and non-covered segments).

WGS needs to update the TIMP and/or O&M plans to include the two code sections referenced above that are not already incorporated.

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

Concern #2:

Question Title, ID ILI Specifications, AR.IL.ILISPECS.R

Question 5. Do records demonstrate that the ILI specifications were complete and adequate?

References 192.947(g) (192.933(b), 192.493)

Assets Covered All Transmission Assets in WGS (AllTrans)

Issue Summary In WGS's response to DR07, WGS provided a specification sheet from ENDURO for their response. This specification sheet does not include records to demonstrate that the ILI specifications were complete and adequate. The IA question references 192.493, which in turn references API 1163.

See API 1163, sections 5 (In-line inspection System Selection), 6 (Qualification of Performance Specifications), and 7 (System Operational Verification) for details. These chapters provide details on what to include in the WGS ILI specifications.

Assessment and Repair : Predicted Failure Pressure (AR.PFP)

Concern #3:

Question Title, ID Anomaly Analysis - Records Process, AR.PFP.ANOMALYREASSESS.P

Question 8. Do procedures detail the reassessment of anomalies when an operator used an Engineering Critical Assessment method?

References 192.605 (192.712(h))

Assets Covered All Transmission Assets in WGS (AllTrans)

Issue Summary WGS did not provide a procedure to demonstrate compliance with 192.712(h) related to engineering critical assessment.

192.712(h) states in part:

(h) Reassessments. If an operator uses an engineering critical assessment method in accordance with paragraphs (c) and (d) of this section to determine the maximum reevaluation intervals, the operator must reassess the anomalies as follows:

(1) If the anomaly is in an HCA, the operator must reassess the anomaly within a maximum of 7 years in accordance with § 192.939(a), unless the safety factor is expected to go below what is specified in paragraph (c) or (d) of this section.

(2) If the anomaly is outside of an HCA, the operator must perform a reassessment of the anomaly within a maximum of 10 years in accordance with § 192.710(b), unless the anomaly safety factor is expected to go below what is specified in paragraph (c) or (d) of this section.

WGS must update its procedures(s) to comply with 192.712(h) related to reassessment of anomalies that have had an engineering critical assessment.

Assessment and Repair : Repair Criteria (HCA) (AR.RCHCA)

Concern #4:

Question Title, ID General Requirements, AR.RCHCA.GENERAL.P

Question 1. Do the repair procedures detail what actions must be taken to address integrity issues?

References 192.907(a) (192.933(a))

Assets Covered All Transmission Assets in WGS (AllTrans)

Issue Summary WGS incorporated wording from 192.933(d) into its TIMP procedures. However, part of the wording in the referenced 192.933(d) is missing. For example, WGS only referenced three monitored conditions listed on page 31 of the WGS TIMP. However, the latest update to 192.933(d)(3) includes six categories for monitored conditions.

WGS must update the language for all categories, including immediate, one-year, and monitored. This will allow WGS to properly categorize the defects and identify timeframes for repair. With regard to repair procedures, WGS covers this requirement in the O&M Plan, Section 3.13 (Repair Procedures and Documentation for Gas Transmission Pipelines).

Concern #5:

Question Title, ID Prioritized Scheduling, AR.RCHCA.SCHEDULE.P

Question 7. Do the repair procedures discuss remediating conditions according to a prioritization schedule in covered segments?

References 192.907(a) (192.933(c))

Assets Covered All Transmission Assets in WGS (AllTrans)

Issue Summary WGS TIMP Plan has not been updated with the latest revision to B31.8S, identified in 192.7. B31.8S is the 2018 version.

WGS needs to update its TIMP Plan with the changes to 192.933(c), which includes the latest version of B31.8S incorporated by reference: B31.8S-2018 (schedule in ASME B31.8S, section 7, Figure 7.2.1-1). See Section 5.5.1 of the TIMP plan, which references the 2004 version of B31.8S.

Concern #6:

Question Title, ID Immediate Repair Conditions, AR.RCHCA.IMMEDIATE.P

Question 9. Do the repair procedures cover all of the elements for making immediate repairs in covered segments?

References 192.907 (192.933(d)(1))

Assets Covered All Transmission Assets in WGS (AllTrans)

Issue Summary WGS has not incorporated the latest changes in Part 192 for the "immediate repair condition" category into its TIMP Plan for covered segments. An immediate repair condition requires an operator to immediately schedule a repair unless the operator lowers pressure on the pipeline or shuts down the pipeline until the operator completes repair of the conditions.

For example, 192.933(d)(iv) requires remediation for metal loss preferentially affecting a detected longitudinal seam— a requirement missing from WGS's TIMP plan.

Furthermore, crack or crack-like anomalies meeting certain criteria are now categorized as immediate repair conditions; however, crack or crack-like anomalies are not specified as an immediate repair condition in WGS's TIMP Plan.

WGS must update the TIMP Plan with the latest changes for the immediate category in Part 192.

Concern #7:

Question Title, ID One-Year Conditions, AR.RCHCA.ONEYEAR.P

Question 11. Do the repair procedures cover all of the elements for making repairs in covered segments for One-year conditions?

References 192.907 (192.933(d)(2))

Assets Covered All Transmission Assets in WGS (AllTrans)

Issue Summary WGS has not incorporated the latest changes in Part 192 for the one-year category into its TIMP Plan. The one-year category includes anomalies or defects that must be repaired within one year of discovery.

WGS needs to update its TIMP Plan with the latest changes for the one-year category. There are multiple changes that need to be added. For example, section 5.5.3 (pg. 30) of the TIMP plan lists seven types of one-year conditions, none of which include cracks as required by 192.933(d)(2). All seven required categories are defined in 192.933(d)(2) and must be included in the WGS TIMP plan.

Concern #8:

Question Title, ID Monitored Conditions, AR.RCHCA.MONITOR.P

Question 13. Do the repair procedures require the operator to record and monitor conditions that meet monitoring criteria in covered segments?

References 192.907 (192.933(d)(3))

Assets Covered All Transmission Assets in WGS (AllTrans)

Issue Summary There are six categories in the latest revision to Part 192 for monitored conditions. The WGS TIMP Plan has three categories for the monitored category.

WGS needs to update the TIMP Plan with the latest additions for the monitored category in Part 192.922(d)(3).

Concern #9:

Question Title, ID Repair Procedures (Weld Patch), AR.RCHCA.CRITERIAWELD.P

Question 22. Do the repair procedures prohibit the operator from using welded patches?

References 192.605(b)(1) (192.711(c))

Assets Covered All Transmission Assets in WGS (AllTrans)

Issue Summary The requirement in 192.711(c) to not use welded patches—with the exception in 192.717(b)(3)—is not in WGS's O&M Plan, Section 3.13 or any other section. WGS must include wording that disallows welded patches in its O&M plan.

Assessment and Repair : Repair Criteria (Non-HCA) (AR.RCNONHCA)

Concern #10:

Question Title, ID Prioritized Scheduling, AR.RCNONHCA.SCHEDULE.P

Question 3. Do the repair procedures discuss remediating conditions according to a prioritization schedule in non-covered segments?

References 192.605 (192.714(c), 192.714(h))

Assets Covered All Transmission Assets in WGS (AllTrans)

Issue Summary The current requirement in 192.714(c) is to include a prioritized schedule. The TIMP Plan does not include a reference to this code requirement (192.714(c)). WGS needs to update its TIMP Plan to include this requirement.

Question Title, ID Immediate Repairs, AR.RCNONHCA.IMMEDIATE.P

Concern #11:

Question 5. Do the repair procedures cover all of the elements for making immediate repairs in non-covered segments?

References 192.605 (192.714(d)(1), 192.714(h))

Assets Covered All Transmission Assets in WGS (AllTrans)

Issue Summary WGC does not have repair procedures that cover all of the elements for making immediate repairs in non-covered segments. Neither WGS's O&M nor TIMP Plan include references to 192.714, which has the requirements for non-HCA repairs for different categories such as "immediate repair conditions". WGS needs to update its O&M Plan or TIMP Plan to include this requirement for an "Immediate" repair in non-covered segments.

Question Title, ID Two-Year Conditions, AR.RCNONHCA.TWOYEAR.P

Concern #12:

Question 7. Do the repair procedures cover all of the elements for making repairs in non covered segments for Two-year conditions?

References 192.605 (192.714(d)(2), 192.714(h))

Assets Covered All Transmission Assets in WGS (AllTrans)

Issue Summary WGS does not have repair procedures that cover all of the elements for making repairs in non-covered segments for Two-year conditions. WGS's TIMP Plan does not reference 192.714, which has the requirements for non-HCA repairs for the "two-year conditions" category. WGS needs to update its TIMP Plan to include the requirement for the "two-year conditions" category.

Concern #13:

Question Title, ID Monitored Conditions, AR.RCNONHCA.MONITOR.P

Question 9. Do the repair procedures require the operator to record and monitor conditions that meet monitoring criteria in non covered segments?

References 192.605 (192.714(d)(3), 192.714(h))

Assets Covered All Transmission Assets in WGS (AllTrans)

Issue Summary WGS does not have repair procedures that require the operator to record and monitor conditions that meet monitoring criteria in non covered segments. WGS's TIMP plan does not reference 192.714, which has the requirements for non-HCA repairs for different categories such as "Monitored Conditions". Also, there is nothing in the TIMP plan that requires WGS to record and monitor conditions that meet the monitoring criteria. WGS needs to update its TIMP Plan to include monitored conditions in non-HCAs.

Concern #14:

Question Title, ID Temporary Pressure Reduction, AR.RCNONHCA.PRESSUREREDUC.P

Question 11. Do the repair procedures require a temporary pressure reduction for making repairs in non-covered segments?

References 192.605 (192.714(e), 192.714(h))

Assets Covered All Transmission Assets in WGS (AllTrans)

Issue Summary WGS does have repair procedures that require a temporary pressure reduction for making repairs in non-covered segments. WGS's TIMP plan does not reference 192.714(e), which lists the requirements for non-HCA temporary pressure reductions. There are three options in 192.714(e) for calculating the required pressure reduction. WGS should include all three options in the WGS TIMP plan.
192.714(h) states:
(e) *Temporary pressure reduction.*
(1) Immediately upon discovery and until an operator remediates the condition specified in paragraph (d)(1) of this section, or upon a determination by an operator that it is unable to respond within the time limits for the conditions specified in paragraph (d)(2) of this section, the operator must reduce the operating pressure of the affected pipeline to any one of the following based on safety considerations for the public and operating personnel:

(i) A level not exceeding 80 percent of the operating pressure at the time the condition was discovered;
(ii) A level not exceeding the predicted failure pressure times the design factor for the class location in which the affected pipeline is located; or
(iii) A level not exceeding the predicted failure pressure divided by 1.1.

Concern #15:

Question Title, ID Other Conditions, AR.RCNONHCA.OTHER.P

Question 13. Do the repair procedures require the operator to take appropriate remedial action for other conditions that could affect safe operations in non-covered segments?

References 192.605 (192.714(f), 192.714(h))

Assets Covered All Transmission Assets in WGS (AllTrans)

Issue Summary There is no reference in the WGS TIMP Plan or the O&M Plan for 192.714(f) for "other conditions". 192.714(f) states:

(f) *Other conditions.* Unless another timeframe is specified in paragraph (d) of this section, an operator must take appropriate remedial action to correct any condition that could adversely affect the safe operation of a pipeline system in accordance with the criteria, schedules, and methods defined in the operator's operating and maintenance procedures.

WGS needs procedures to address the requirements of 192.714 and the different categories of defects not included in the TIMP Plan for non-HCAs, including the "other conditions" category.

Concern #16:

Question Title, ID Crack Defects, AR.RCNONHCA.CRACK.P

Question 15. Do the repair procedures require the operator to perform direct examinations of known locations of cracks or crack-like defects?

References 192.605 (192.714(g), 192.714(h))

Assets Covered All Transmission Assets in WGS (AllTrans)

Issue Summary WGS's plans (TIMP and/or O&M) do not include repair procedures that require the operator to perform direct examinations of known locations of cracks or crack-like defects. WGS needs to address the requirement of section 192.714(g), which states:

(g) In situ direct examination of crack defects. Whenever an operator finds conditions that require the pipeline to be repaired, in accordance with this section, an operator must perform a direct examination of known locations of cracks or crack-like defects using technology that has been validated to detect tight cracks (equal to or less than 0.008 inches crack opening), such as inverse wave field extrapolation (IWEX), phased array ultrasonic testing (PAUT), ultrasonic testing (UT), or equivalent technology. "In situ" examination tools and procedures for crack assessments (length, depth, and volumetric) must have performance and evaluation standards, including pipe or weld surface cleanliness standards for the inspection, confirmed by subject matter experts qualified by knowledge, training, and experience in direct examination inspection for accuracy of the type of defects and pipe material being evaluated. The procedures must account for inaccuracies in evaluations and fracture mechanics models for failure pressure determinations.

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

Concern #17:

Question Title, ID Prevention of Accidental Ignition, AR.RMP.IGNITION.R

Question 4. Do records indicate adequate steps were taken by the operator to prevent accidental ignition prior to performing work?

References 192.751(a) (192.751(b), 192.751(c))

Assets Covered All Transmission Assets in WGS (AllTrans)

Issue Summary WGS states in response to DR19 that records are not required per its O&M procedure.

However, 192.603(b) requires: *"Each operator shall keep records necessary to administer the procedures established under § 192.605."* These procedures include O&M and Emergency Plan Procedures.

192.751 has specific requirements related to prevention of accidental ignition. WGS needs to develop a process to ensure the requirements of 192.751 are met. For example, a form could be used.

Concern #18:

Question Title, ID Transmission Lines General Requirements for Repair Procedures, AR.RMP.REPAIRREQT.P

Question 9. Does the repair process capture the requirements of 192.711 for transmission lines?

References 192.605(b)(1) (192.711(a), 192.711(b), 192.711(c), 192.717(b)(3))

Assets Covered All Transmission Assets in WGS (AllTrans)

Issue Summary WGS discusses the repair process in its O&M Plan, Section 3.13. Welded patches are not explicitly disallowed as noted in 192.711(c). In other words, WGS should state in its O&M Plan, Section 3.13 that welded patches are not allowed with the exception noted.

192.711(c) states:

Except as provided in § 192.717(b)(3), no operator may use a welded patch as a means of repair.