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October 16, 2025

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) submitted the following Notice of Probable Violations (NOPV) for the DOT reportable incident (DOT Initial #1426420) that occurred on March 20, 2025, at the intersection of W Esplanade Ave and S State St, San Jacinto, in Riverside County, CA.

Below is SoCalGas' written response.

Please contact ██████████ on (213) 671-1344 if you have any questions or need additional information.

Sincerely,

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██████████

Pipeline Safety and Risk Mitigation Manager

CC:

Rodger Schwecke, SoCalGas
Kevin Geraghty, SDG&E
Mahmoud Intably, SED/GSRB
Gordon Kuo, SED/GSRB
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██████████, CPUC

2025 SoCalGas DOT #1426420 Incident Investigation Response

Violations:

1. California Government Code (CGC) 4216.4(a)(1):

“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.”

SoCalGas failed to expose SL41-17 with hand tools before using power-drive excavation tools. SL41-17 was within the tolerance zone of 24 inches on each side of the markings. While SoCalGas did pothole the Medium Pressure Gas Pipeline (MPGP), they did not pothole SL41-17 at the same location. SoCalGas allowed the use of a backhoe within the tolerance zone, leading to contact damage with the 1-inch diameter, 3-inch-long nipple welded to the top of SL41-17. Therefore, SoCalGas is in probable violation of CGC § 4216.4(a)(1) for failing to determine the exact location of the subsurface installation 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.

SoCalGas Response:

SoCalGas has reviewed the Safety and Enforcement Division’s (SED) finding of a probable violation of California Government Code § 4216.4(a)(1), which requires the use of hand tools to determine the exact location of subsurface installations within the tolerance zone prior to the use of power-driven excavation equipment. Based on the completed internal investigation, SoCalGas confirms that SL41-17, located within the 24-inch tolerance zone of the marked Medium Pressure Gas Pipeline (MPGP), was not exposed using hand tools prior to mechanical excavation. Although the medium pressure gas main was properly potholed, SL41-17 was not, resulting in contact damage to a welded nipple on the facility due to the use of a backhoe.

Corrective Actions:

To address the procedural deviation and reinforce accountability, SoCalGas has implemented the following corrective actions:

- **Employee-Specific Coaching and Documentation**
The employee responsible for oversight during the excavation has received formal coaching regarding the requirements of CGC § 4216.4(a)(1) and SoCalGas excavation procedures. This coaching session was documented and placed in the employee’s performance file.

- **Refresher Training for Responsible Personnel**

The involved employee, along with their immediate team, has completed targeted refresher training focused on proper potholing practices, tolerance zone protocols, and hazard prevention measures.

- **Performance Monitoring**

The responsible employee has been placed under a temporary performance review period, during which their field activities will be monitored to ensure compliance with excavation standards and procedural expectations.

2. Title 49 Code of Federal Regulations (CFR) Part 192.605(b)(3):

“Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities [...] [The manual must include procedures for] ...[m]aking construction records, maps, and operating history available to appropriate operating personnel.”

SoCalGas’s relevant manual, SoCalGas Gas Standard (GS) 192.0010, Preparation of Construction Sketches, Section 4.28 states: “For construction purposes, list minor fittings such as abandoned nipples, when it is not obvious that they are required.” However, SoCalGas stated in its response that, “The damaged nipple is a minor fitting typically used in conjunction with pressure control fittings. In this case the AB nipple was installed near an 8”x6” oversized pressure control fitting. Because the oversized 8”x6” pressure control fitting was near the location of the damage, it is reasonable and obvious to expect a minor fitting, such as a nipple, to be present with this installation as well.”

However, it is not reasonable and obvious that the long nipple was required to be on the SL41-17, so it should have been listed on the construction sketch. None of the seven people who were working at the site at the time of the incident (five Teichert employees, one SoCalGas Stand-by person, and one Sharps Backhoe employee) anticipated that a 1-inch diameter, 3-inch-long nipple was welded to the top of SL41-17. Moreover, the SoCalGas GS does not state that it is reasonable to expect long nipples next to a pressure control fitting. SoCalGas did not provide any supporting documentation that its employees or contractors should be aware of long nipples co-located with pressure control fittings. For these reasons, SED finds that it was not obvious that the long nipple was required in that location of SL4-71, and the long nipple should have been included on the construction map. Therefore, SED finds SoCalGas in probable violation of G.O. 112-F, Reference Title 49 Code of Federal Regulations (CFR) Part 192.605(b)(3) for failure to make accurate construction records, maps, and operating history available to appropriate operating personnel, including the existence of the nipple on its construction map.

SoCalGas Response:

Thank you for your detailed review and findings regarding the incident involving SL41-17. We appreciate the commitment to pipeline safety and transparency. After

Careful internal review, SoCalGas respectfully disagrees with the conclusions drawn in the probable violations cited under Title 49 CFR Part 192.605(b)(3).

SoCalGas's investigation determined that a change in standby personnel at the time of the incident and a lack of communication among company and contractor personnel about the presence of the pressure control (pc) fitting visible in our company records ultimately led to the incident.

Abandonment nipples are currently collected as part of the high-pressure data collection process on new construction projects and are a mapped feature in our GIS system. This location was historic in nature and was mapped under differing practices but the presence of the pc fitting and pipe alignment was known. Operations personnel had sufficient information available to avoid the incident but lacked the handoff of necessary information that was available in our records.

The citation of Gas Standard (GS) 192.0010, Preparation of Construction Sketches is not applicable. This map product is used pre-construction as a proposed construction plan. A completion drawing is used for documentation of field installations.

Training of personnel as a corrective action for this incident is outlined in NOPV item 1 and 3 regarding proper excavation practices and expected communication protocols as outlined in SoCalGas Standard GS 184.09.

3. Title 49 Code of Federal Regulations (CFR) Part 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.”

SoCalGas did not follow its procedures as listed below.

a) SoCalGas GS 184.09, Section 4.3.1.5 states:

“Stand-by and provide guidance while potholing is taking place. Hand digging across the entire tolerance zone down to the depth of the planned excavation plus an additional 18-inches of depth is permitted in lieu of finding the exact location of the high priority subsurface installation.”

The Stand-by did not provide guidance to expose SL41-17 by hand digging. SL41-17 was at the same depth and 12 inches away from the MPGP, which is within 24 inches of the tolerance zone. Therefore, SED finds SoCalGas in probable violation of G.O. 112-F, Reference Title 49 Code of Federal Regulations (CFR) Part 192.605(a) for failure to provide guidance to hand dig, as required by its GS.

b) SoCalGas GS 184.09, Section 4.3.1.14 states:

“Report indications and instances where Company subsurface installations are or may become endangered to the excavator’s supervisor and the project inspector of the agency responsible for the work.”

The Stand-by failed to identify the danger/potential threat of using heavy equipment too close to SoCalGas’ underground facilities and to communicate these threats with Teichert and Sharps Backhoe’s management. Therefore, SED finds SoCalGas in probable violation of G.O.112-F, Reference Title 49 Code of Federal Regulations (CFR) Part 192.605(a) for failure to report/communicate these indications/instances with the excavator’s supervisor.

SoCalGas Response:

SoCalGas acknowledges the Safety and Enforcement Division’s (SED) findings regarding probable violations of General Order 112-F and Title 49 CFR Part 192.605(a), specifically related to procedural requirements outlined in GS 184.09 Sections 4.3.1.5 and 4.3.1.14.

Following a thorough internal investigation, SoCalGas has confirmed that procedural deviations occurred during the excavation activities in question. The investigation findings have been reviewed, and corrective actions have been implemented to address the identified gaps and prevent recurrence.

Corrective Actions:

To address the issues identified in both violations, SoCalGas has taken the following corrective actions:

- **Targeted Training and Refresher Courses**
The responsible employee has completed refresher training focused on GS 184.09 Sections 4.3.1.5 and 4.3.1.14. Training emphasized proper guidance during potholing, hand-digging requirements within tolerance zones, hazard recognition, and communication protocols.
- **Enhanced Field Communication Standards**
Clear expectations for field communication and escalation procedures have been established and reinforced during tailgate meetings and safety briefings.

SoCalGas remains committed to continuous improvement, regulatory compliance, and the safety of its operations. We appreciate SED’s oversight and will continue to work collaboratively to ensure that all field practices align with applicable standards and internal procedures.