



---

**GILL RANCH STORAGE®**

---

November 8, 2016

David A. Weber  
President and CEO  
Tel: 503.220.2405  
Fax: 503.721.2490  
Toll Free: 1.866.537.9245  
E-mail: [dweber.nwngs@nwnatural.com](mailto:dweber.nwngs@nwnatural.com)

VIA U.S. MAIL & E-MAIL [[KAB@CPUC.CA.GOV](mailto:KAB@CPUC.CA.GOV)]

Kenneth Bruno  
Program Manager  
Gas Safety and Reliability Branch  
Safety and Enforcement District  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3298

Subject: General Order 112 Gas Inspection of Gill Ranch Storage  
[GI-2016-03-GRS38-01B]

Dear Mr. Bruno:

The Safety Enforcement Division (SED) recently sent Gill Ranch Storage, LLC (GRS) its findings from its March 2016 General Order 112 inspection of certain Gill Ranch records and facilities. GRS has reviewed the two (2) Areas of Concern / Recommendations identified by SED and has adopted the recommendations. GRS's response to each recommendation is provided below.

**Area of Concern / Recommendations**

- 1) During the record review, SED discovered that GRS hires a third party (Basin Valve Company) to conduct maintenance on their pressure relief devices. Basin Valve Company follows its own pressure relief device maintenance procedure written by Basin Valve Company and approved by GRS, instead of the one written by GRS. SED recommends removing or archiving the procedure written by GRS if it has no foreseeable use. SED also recommends GRS update its procedures to accurately list those covered tasks conducted by their own personnel, and those conducted by contractors.

**GRS Response:**

1. GRS has removed and archived the procedures that are not performed by GRS personnel, as recommended. The list of Gill Ranch Storage Covered Tasks has been updated accordingly.
2. All future contractor work procedures, performed as "Covered Tasks", shall be retained separately as Contractor Covered Tasks. A list of these covered tasks shall be retained separate from GRS personnel covered tasks.

Kenneth Bruno  
California Public Utilities Commission  
Safety and Enforcement Division  
November 8, 2016  
Page 2

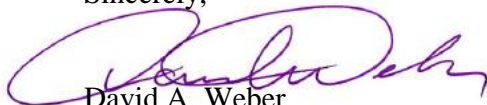
- 2) GRS documented valve inspection and maintenance on its roll charts. The inspection and maintenance is performed with at least two individuals; however, the roll charts list only one individual per inspection. The individual listed in the roll chart may or may not be the qualified individual for the covered task. Span of Control is allowed within the operator qualification plan however SED recommends GRS document all individuals that performed the valve inspection and maintenance to ensure the qualified individual is represented for the covered task.

**GRS Response:**

GRS will list all individuals who performed “Covered Tasks” (e.g., valve inspections and maintenance) in its Inspection and Test Roll-up Records. The individual qualified to perform and/or supervise the Covered Task shall be identified.

Please let me know if you have any questions about GRS’s response to the SED inspection findings.

Sincerely,



David A. Weber  
President and CEO