

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



August 10, 2016

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Wayne, PA 19087

GI-2016-05-WGS-36-01B  
GI-2016-05-WGS-36-15

SUBJECT: General Order 112 Inspection of Wild Goose Gas Storage

Dear Mr. Casaday:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC) conducted a General Order 112 inspection of Wild Goose Gas Storage (WGS) on May 15 through 18, 2016 and July 13, 2016.<sup>1</sup> The inspection included a review of WGS's records for the period of 2013 through 2015. SED staff also reviewed WGS's operator qualification records, which included a field observation of randomly selected individuals performing covered tasks.

SED's findings are noted in the Summary of Inspection Findings (Summary) which is enclosed with this letter. The Summary reflects only those particular records and pipeline facilities that SED reviewed during the inspection.

Within 30 days of your receipt of this letter, please provide a written response indicating the measures taken by WGS to address the violations and observations noted in the Summary. Pursuant to Commission Resolution ALJ-274, SED staff has the authority to issue a citation for each violation found during the inspection.

If you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Kenneth A. Bruno".

Kenneth Bruno  
Program Manager  
Gas Safety and Reliability Branch  
Safety and Enforcement Division

Enclosure: Summary of Inspection Findings

cc: Gary Theberge, NISKA Gas Storage Partners ([Gary.Theberge@niskapartners.com](mailto:Gary.Theberge@niskapartners.com))  
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<sup>1</sup> General Order 112-F was adopted by the Commission on June 25, 2015 via Decision 15-06-044.

## **SUMMARY OF INSPECTION FINDINGS**

### **A. Probable Violations**

1. Title 49 CFR §192.605(a) states in part:

*“Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response.”*

SED reviewed valve maintenance records and noted discrepancy between what is required by the Operations and Maintenance (O&M) plan versus what is actually being used by WGS personnel. WGS is currently using form 7.01A “Emergency Valve Inspection Report” to record maintenance activities for emergency valves, while WGS’s O&M procedures references form 119 for recordkeeping. WGS must follow the requirements of their O&M procedures.

2. Title 49 CFR §192.745(b) states in part:

*“Each transmission line valve that might be required during any emergency must be inspected and partially operated at intervals not exceeding 15 months, but at least once each calendar year.”*

SED requested maintenance records for the following valves, without the records SED was unable to verify WGS has met compliance with this subpart:

<b>Year</b>	<b>Valve Number</b>
2015	FV-4002
2015	BV-200E1
2014 & 2015	All FV valves at the well pad
2013	BV-200D1

Please provide SED with maintenance records for the above referenced valves.

## **B. Areas of Concern/ Observations/ Recommendations**

1. SED requested the welding qualification for welding inspector listed as “PE”. Please provide the qualification for this individual.
2. SED requested the NDE procedures from NTL pipelines Inc. (Radiographic Procedure, Issue 4, Rev 1). Please provide SED with a copy of this procedure for review.
3. SED reviewed the valve maintenance records and noted the following inconsistencies in the records:
  - a. Valve ESDV-2130, ESDV-2150, ESDV-101A-2, ESDV-103V3-2, ESDV-203V3-2 in 2013 were noted as being operated in the remarks but maintenance form 7.01A was checked “No” for the question “Valve Partially Operated.”
  - b. The inspection report for Valve EMV-101CA10 in 2014 was not filled out completely; most of the fields were left blank.
  - c. Valve BV-201U1A-1 was marked as a “Blowdown Valve” in 2013 and 2014 but was identified as a “Block Under Relief Valve” in 2015.
4. During field verification at the well pad, SED noted valve BV-200K1 as being a 24” valve but the master index shows this valve as “To 30” pig launcher”. Please make the necessary corrections to the records and provide SED with confirmation regarding the size of this valve.
5. During field verification at the well pad, SED noted valve BV-200C1 was labeled as FV-200C1 in the field. Please provide SED with confirmation regarding the correct classification of this valve and update the necessary records.