

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



May 2, 2019

GI-2019-03-WGS-36

Mathieu Fournier, VP of Eng/Ops ([Mathieu.Fournier@rockpointgs.com](mailto:Mathieu.Fournier@rockpointgs.com))  
Niska Gas Storage Partners LLC  
400, 607 – 8th Avenue S.W.  
Calgary, Alberta, Canada T2P 0A7

**SUBJECT: General Order 112-F Comprehensive Operation and Maintenance Inspection of Wild Goose Gas Storage LLC.**

Dear Mr. Fournier:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a General Order 112-F Comprehensive Operation and Maintenance Inspection of Wild Goose Gas Storage LLC (WGS) on March 3 through 7, and March 11, 2019. SED used the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety's "Inspection Assistant Form" as a reference guide to conduct the inspection. SED conducted field inspections of pipeline and storage facilities near the town of Gridley in Butte County. SED's staff also reviewed the Public Awareness Program and Operator Qualification program, which included field observation of randomly selected individuals performing covered tasks.

SED's staff identified one probable violation of G.O. 112-F, Reference Title 49, Code of Federal Regulations (CFR), Parts 191, 192 and 193 and nine areas of concern of which are described in the attached "Post-Inspection Written Preliminary Findings".

Within 30 days of your receipt of this letter, please provide a written response indicating the measures taken by WGS to address the violation and concerns noted in the Post-Inspection Written Preliminary Findings.

If you have any questions, please contact Mahmoud (Steve) Intably at (213) 576-7016 or by email at [mai@cpuc.ca.gov](mailto:mai@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink that reads "Dennis Lee".

Dennis Lee, P.E.  
Program and Project Supervisor  
Gas Safety and Reliability Branch  
Safety and Enforcement Division

cc: Harold Gold, WGS ([Harold.Gold@rockpointgs.com](mailto:Harold.Gold@rockpointgs.com))  
Gary Theberge, WGS ([Gary.Theberge@rockpointgs.com](mailto:Gary.Theberge@rockpointgs.com))  
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# Post-Inspection Written Preliminary Findings

**Date of Transmittal:** 04/05/2019

**Dates of Inspection:** March 3-7 and 11, 2019

**Operator:** WILD GOOSE STORAGE LLC

**Operator ID:** 31287

**Inspection Systems:** Wild Goose Storage Facility

**Assets (Unit IDs):** Wild Goose Storage (88673 (36))

**System Type:** GT

**Inspection Name:** Wild Goose Gas Storage (Comprehensive Standard Transmission)

**Lead Inspector:** Mahmoud (Steve) Intably

**Operator Representative:** Gary Theberge

## Violation

### Time-Dependent Threats: External Corrosion - CP Monitoring (TD.CPMONITOR)

- 1) **Question** Do records adequately document cathodic protection monitoring tests have occurred as required?

References 192.491(c) (192.465(a))

Assets Covered Wild Goose Storage (88673 (36))

Issue Summary 49 CFR, §192.469 states: "Each pipeline under cathodic protection required by this subpart must have sufficient test stations or other contact points for electrical measurement to determine the adequacy of cathodic protection".

49 CFR, §192.465(a) states in part: "Each pipeline that is under cathodic protection must be tested at least once each calendar year, but with intervals not exceeding 15 months, to determine whether the cathodic protection meets the requirements of §192.463"

WGS' Operation and Maintenance Manual, Section 3.5 states: Cathodic protection test stations or contact points shall normally be located at pipeline mile markers, cased crossings, and other convenient locations. Recommended test station spacing should generally not exceed 1 mile.

SED noted that WGS's procedure requires test station spacing not to exceed 1 mile. During records review, SED found that due to a bad test lead / a damaged test station, WGS did not take CP reads for approximately 3 years. At the same time, the actual spacing between the test stations ranged from 1.6 to 3.2 miles. Therefore, WGS is in violation of G.O. 112-F, Reference Title 49 CFR, Part 192, Section 192.465 and 192.605(a) for failure to take the CP reads, promptly correct any deficiencies indicated by the monitoring, and to follow its procedure.

# **Concerns**

## **Maintenance and Operations: Gas Pipeline Operations (MO.GO)**

- 1)      **Question** Has the operator conducted annual reviews of the written procedures or processes in the manual as required?
- References 192.605(a)
- Assets Covered Wild Goose Storage (88673 (36))
- Issue Summary SED noted that TIPS-Task Information and Practices System's review document was not updated for year 2018. SED recommends that WGS take the appropriate actions to ensure the documents were reviewed and updated accordingly
- Question Text Do records indicate periodic review of the work done by operator personnel to determine the effectiveness, and adequacy of the processes used in normal operations and maintenance and modifying the processes when deficiencies are found?
- References 192.605(a) (192.605(b)(8))
- Assets Covered Wild Goose Storage (88673 (36))
- Issue Summary SED noted that WGS' Operations and Maintenance Manual did not include a procedure to describe the review process of work done by its personnel, including the record requirement of such process. SED recommends that WGS prepare and follow a procedure that will address job performance and evaluation of its personnel-QA/QC.

## **Time-Dependent Threats: Atmospheric Corrosion (TD.ATM)**

- 2)      **Question** Is pipe that is exposed to atmospheric corrosion protected?
- References 192.481(b) (192.481(c), 192.479(a), 192.479(b), 192.479(c))
- Assets Covered Wild Goose Storage (88673 (36))
- Issue Summary SED noted during the field inspection that valve on Well 27 below cameron tag, flange on well 28H, sections on the flowline for well 20H, and well 30HZ were exposed to the atmosphere and had evidence of atmospheric corrosion. SED recommends that WGS takes the appropriate corrective measure to remedy the atmospheric corrosion on its pipeline.

## **Training and Qualification: Training of Personnel (TQ.TR)**

- 3)      **Question** Is training for emergency response personnel documented?
- References 192.615(b)(2) (192.807(a), 192.807(b))
- Assets Covered Wild Goose Storage (88673 (36))
- Issue Summary SED noted that WGS' Emergency Response Plan, Section 1.2.1.3 training of appropriate personnel on emergency requires personnel on the Emergency Response Team (ERT) be trained on the FEMA Incident Command System ICS-100 course once every 3 years. WGS did not substantiate this practice with any records during this inspection period (2013 to 2018). SED recommends that WGS to follow its procedure and trained its personnel once every 3 years.

## **Generic Questions: Generic Questions (GENERIC.GENERIC)**

- 4)      **Question** Generic question - please provide context in result notes.
- References N/A
- Assets Covered Wild Goose Storage (88673 (36))
- Issue Summary
- I. SED noted that WGS' OQ program did not address the number of times an individual can be reevaluated after he/she failed to pass the evaluation process. In addition, if a reevaluation is offered, WGS should require the individual to go through a "cooling off" period following a failure to pass the evaluation. SED recommends that WGS to review and revise, wherever applicable, its OQ program to require individual to go through a "cooling off" period

following an unsuccessful attempt of an evaluation. See PHMSA FAQ OQ 2.11.

- II. SED noted that WGS' OQ program, Section 3.5, "inspection shall follow all coating application" did not address the qualifications of the Coating Inspector. SED recommends that WGS to review and revise, wherever applicable, its OQ program to address the qualifications of the "Coating Inspector".
- III. SED noted that WGS' Operation and Maintenance Manual, Section 3.5 Corrosion Control published date 2/13/2019, did not address the amount of cathodic protection (upper limit) as required by 49CFR, §192.463(c) so that to prevent damage to the protective coating or the pipe. SED recommends that WGS to review and revise, wherever applicable, its corrosion control procedure to address the requirement of 49CFR, §192.463(c).
- IV. SED noted that WGS' Operation and Maintenance Manual, Section "Record Keeping" did not address the recordkeeping/retention period for transmission lines as required by G.O. 112-F, Subpart C 145.1. SED recommends that WGS to review/revise its manual to include the requirement set forth in G.O. 112-F, Subpart C 145.1.
- V. SED noted during the field inspection at Delevan compressor station, valve number MCV-03 had a gas leak. In addition, SED observed that wellhead (valves, fittings, and piping that controls the flow of gas) in a cellar of well 32H was submerged in water and air bubbles were forming on the water surface which indicate the possibilities of a gas leak. SED recommends that WGS to investigate and take prompt remedial actions to correct the deficiencies.