



[REDACTED]  
*Pipeline Safety and Compliance Manager*  
[REDACTED]  
[REDACTED]

October 21, 2013

Mr. Michael Robertson, P.E.  
Program Manager  
Gas Safety and Reliability Branch  
Safety and Enforcement Division  
California Public Utilities Commission  
320 W. Fourth Street, Suite 500  
Los Angeles, CA 90013

Dear Mr. Robertson:

The staff of the Safety and Enforcement Division (SED) conducted a General Order (GO) 112-E compliance inspection of Southern California Gas Company's (SoCalGas) East Area Transmission facilities from April 8 through April 19, 2013. The inspection included a review of records and field activities from April, 2012 through March, 2013. Your staff also reviewed SoCalGas' Operator Qualification records and field observations of randomly selected individuals performing covered tasks. By letter dated September 18, 2013, you provided SoCalGas with the Summary of Inspection Findings and Recommendations from this review and requested that SoCalGas provide a written response within 30 days of receipt of the letter, indicating the measures taken by SoCalGas to address the probable violation and recommendations noted in the Summary. SoCalGas' written responses are provided in the following attachments.

Please feel free to contact me at [REDACTED], if you have any questions or need additional information.

Sincerely,

[REDACTED]  
Pipeline Safety and Compliance Manager

Attachments

Cc: Jerry Palo, CPUC-Los Angeles

## Attachment 1 Response to Audit Findings

### Audit Finding

#### **Title 49 Code of Federal Regulations (CFR)§192.751-Prevention of accidental ignition, states:**

*Each operator shall take steps to minimize the danger of accidental ignition of gas in any structure or area where the presence of gas constitutes a hazard of fire or explosion, including the following:*

- (a) When a hazardous amount of gas is being vented into open air, each potential source of ignition must be removed from the area and a fire extinguisher must be provided.*
- (b) Gas or electric welding or cutting may not be performed on pipe or pipe components that contain a combustible mixture of gas and air in the area of work.*
- (c) Post warning signs, where appropriate.*

You stated that SED conducted an inspection of mainline valves on Line 6916 and observed a SoCalGas Region employee light a cigarette within 20 feet of valve station 140.42 - 0 in Cabazon and inside valve station 120.00 in 29 Palms. You further stated that per SoCalGas procedure 166.015, Section 4.2, Company personnel must control sources of ignition, not limited to cigarettes, within transmission and storage facilities. Finally, you indicated smoking is prohibited inside the valve station in 29 Palms and within 50 feet outside the valve station in Cabazon and that SoCalGas is in violation of GO 112-E, Reference Title 49 CFR Part §192.751

### Response

Our review of notes from this audit indicates a slight difference in locations and valve station numbering involving an employee smoking. Our records indicate smoking inside a fenced valve station enclosure occurred at valve station 140.42-0 in 29 Palms, and outside a valve station enclosure at valve station 120.00 in Yucca Valley.

The fenced valve station 140.42-0 was approximately 440 feet by 440 feet, and marked “no smoking.” Our employee indicated that he was indeed smoking inside the closure, approximately 80 feet from the valve equipment.

Regarding valve station 120.00, our employee was observed smoking outside the valve station enclosure, in an area that the employee and his manager who was on site both believed safe and would not create a source of ignition in a gaseous atmosphere.

### Corrective Action

Employee was counseled to focus on surroundings, potential for gas hazard, and to obey posted “no smoking” signs, even if they are a significant distance from any potential gas hazard. Gas Standard 166.0015 “Fire Prevention and Protection - Transmission and Storage” is being reviewed with all East Area Transmission field employees.

Attachment 2  
Response to Audit Observations

**Recommendation #1**

SED observed the right-of-way for Line 2000 near Cabazon and noted several damaged pipeline markers. The pipeline markers were located between milepost (MP) 135.22 – MP153.98. The Region needs to install new pipeline markers at these locations at the earliest convenience.

**Response**

The area described is primarily desert, remote locations. SoCalGas patrols these pipelines and checks for and replaces pipeline markers. Pipeline markers do get damaged, vandalized, burned, shot-up, etc. between patrols.

**Actions Taken**

Gas Standard 223.0075, “Pipeline Markers” is being reviewed by all East Area Transmission employees performing patrolling tasks on the pipeline. Supplemental pipeline markers will be considered for installation in locations where they may currently be subject to recurring damage and/or removal.

## **Recommendation #2**

SED observed the field testing of the audio and visual alarms of Compressor Plant 2 in Blythe station and found the alarms to be inaudible. In addition, the visual alarms outside the station blended with the sunlight, further reducing their visibility. SED recommends that SoCalGas upgrade the audio and visual alarms for Compressor Plant 2 in Blythe Station. |

## **Response**

SoCalGas agrees with this observation.

## **Actions Taken**

The visual indicators/lights/fixtures were removed, cleaned and the bulbs inspected. The existing lower-wattage soft white bulbs were replaced with unfrosted higher-wattage bulbs. The audible alarm was removed and its elements assessed, cleaned, and adjusted for optimum sound level output. With all units in the building online, the alarm can now be heard throughout the building during testing. Through these actions, both visual (brightness) and audible (volume) indicators of the alarm system have been improved.

### **Recommendation #3**

SED recommends that SoCalGas modify its procedures to clarify the operation of transmission crossover and bypass valves. SED recommends adding a guideline of station valve conditions in SoCalGas FCD 223.0215.

### **Response**

Valve operation is part of training and Operator Qualification for Transmission field positions. There may be opportunities to further expand instructions in associated Gas Standard(s).

### **Actions Taken**

SoCalGas is reviewing these practices internally with associated Gas Standard subject matter experts. This review may lead to modifications/additions to the Gas Standard(s).

#### **Recommendation #4**

SED recommends improving the communication protocol between Baja Norte and SoCalGas regarding delivery of natural gas at Blythe station from Baja Norte. SED observed several recorded high-alarms across the valve connecting both pipelines.

#### **Response**

Records provided confirm repeat minor high-alarms on pipeline. These high-alarms did not constitute an MAOP Exceedence

#### **Actions Taken**

SoCalGas designed modifications to the automatic controls to allow flow from Baja Norte only after the header valves are open. This will prevent the header from taking a surge of pressure faster than the regulation valves can react. These modified controls and programming changes have not yet been fully installed.

In the interim, Baja Norte is instructed to call Gas Control to inform Gas Control when they are ready to flow. Gas Control is instructed to then call operations personnel at Blythe Station. Valves are to be operated manually by operations personnel at Blyth Station to allow Baja Norte gas to flow into the system. Operations personnel are instructed to verify that header valves are open prior to flowing gas to prevent the header from taking a surge of pressure faster than the regulation valves can react. This communications protocol will remain in effect until modified automatic controls have been tested and verified to prevent pressure excursions.