



**Alex Hughes**  
Pipeline Safety and Risk Mitigation  
Manager  
1775 Sampson Ave, ML8064  
Corona, CA 92879  
949-697-2539  
AHughes@SoCalGas.com

August 12, 2022

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 conducted a General Order (G.O.) 112-F Comprehensive Operation and Maintenance Inspection of Southern California Gas Company (SoCalGas)'s Goleta Storage Facility from April 18 through 22, 2022 for calendar years 2018 through 2021. The inspection included a review of the operation and maintenance records, procedures, and Operator Qualification records pursuant to G.O. 112-F, Reference Title 49, Code of Federal Regulations (49 CFR), Parts 191 and 192. In addition, SED conducted field inspections of pipeline facilities that included field observation of randomly selected individuals performing covered tasks at Goleta Storage Facility in the city of Goleta in Santa Barbara County. SED's staff used the Pipeline and Hazardous Materials Safety Administration's (PHMSA) Inspection Assistance (IA) as a reference guide to conduct this inspection.

SED staff identified one (1) areas of concern. Attached are SoCalGas' written responses.

Please contact Alex Hughes at (949)697-2539 if you have any questions or need additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Alex Hughes", with a long horizontal flourish extending to the right.

Alex Hughes  
Pipeline Safety and Risk Mitigation Manager

CC:  
Kan Wai Tong, SED/GSRB  
Molla Mohammad Ali, SED/GSRB  
Claudia Almengor, SED/GSRB  
Matthewson Epuna, SED/GSRB

## **2022 SoCalGas Goleta Storage Audit Response**

### **Concern(s)**

#### **1. External Corrosion - Cathodic Protection**

Question: 14. Are measures performed to ensure electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?

References: 192.467(a) (192.467(b), 192.467(c), 192.467(d), 192.467(e))

Assets Covered: 87077

Issue Summary: On work order #7399927, Line 5026-AN at More 1 Well location, SoCalGas recorded a pipe to soil reading of -1 mV. During SED's field visit to this location, SoCalGas recorded a pipe-to-soil (PS) reading of -719mV. SoCalGas indicated that this location was abandoned. However, CP readings (-719mV) at the location indicated that the pipe may still be electrically connected to the system. SoCalGas should take appropriate steps to demonstrate that the abandoned line is electrically isolated from the Cathodic Protection System or provide documentation to show that -719mV is the native pipe to soil read of Line 5026-AN.

### **Response & Actions:**

Yes, measures are performed to ensure electrical isolation, however electrical isolation is not applicable in this instance because the More 1 kill lines were not abandoned or removed as noted below on follow up work order #7459776, nor were they electrically isolated from the cathodic protection system at the time of the audit in April 2022. The More 1 kill lines remain in service and are part of the cathodic protection system.

The follow-up Maximo work order #7459776 created on October 13, 2020, indicates that pipe at this location has been removed/abandoned. There was pipe removed from this area; however, it was not associated with the More 1 well as noted in the work order but was associated with Goleta 1 well location and its piping. The Goleta 1 well kill lines which were removed along with all the other piping during abandonment of Goleta 1 well. A temporary rig on site may have prevented further investigation to confirm field observations.

On October 14, 2020; a CP read of -0.001V (-1mV) was recorded on Maximo work order #7399927 for GOL-5026~0.28-P. This -1mV value is not an actual reading. It is a method in which we denote inaccessibility to a location. This process is an acceptable work practice per the gas standard noted below. While completing work related to the original work order #7399927 the employee was not able to access the More 1 well location due to a temporary rig on site as noted above.

Gas Standard 186.0135 (Section 4.3.1.1.) states: *Record a read of -0.001V for a test point and -0.001A for a bond read found to be paved over, missing, damaged or otherwise inaccessible and unreadable. This generates a troubleshoot order used to track the identification, repair, or change of the monitoring location. Issue MAXIMO follow-up order to correct deficiency.*

The recorded pipe-to-soil (PS) reading of -0.719V (-719mV) was taken on the associated kill lines for More 1 well location on April 20, 2022, during the CPUC field observations. SoCalGas has taken the following actions to correct the out-of-tolerance CP read at the More 1 well location:

- Installed a sacrificial anode for the More 1 well kill lines
- Replaced the existing bond box at More 1 well location with a new CP bond box
- Recorded a pipe-to-soil (PS) CP read for the More 1 well kill lines, -1.699V (-1,699mV)
  - *This data was previously communicated to the CPUC on July 5, 2022*
- Recorded a current read of 1.8A at the More 1 well casing
  - *This data was previously communicated to the CPUC on July 5, 2022*