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February 25, 2022

Mr. Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628

Re: Notice of Amendment (NOA) CPF 1-2022-002-NOA, - Pacific Gas and Electric Company (PG&E) Response and Closure Request

Dear Mr. Burrough:

Pacific Gas and Electric Company (PG&E) submits this response to NOA CFP 1-2022-002-NOA, dated January 28, 2022, and respectfully requests your review in support of closure.

For clarity, each of the four items identified in the NOA will be repeated followed by PG&E's response.

Item #1:

§ 192.12 Underground natural gas storage facilities.

(a) ...

(c) *Procedural manuals. Each operator of a UNGSF must prepare and follow for each facility one or more manuals of written procedures for conducting operations, maintenance, and emergency preparedness and response activities under paragraphs (a) and (b) of this section. Each operator must keep records necessary to administer such procedures and review and update these manuals at intervals not exceeding 15 months, but at least once each calendar year. Each operator must keep the appropriate parts of these manuals accessible at locations where UNGSF work is being performed. Each operator must have written procedures in place before commencing operations or beginning an activity not yet implemented.*

PGE's written procedures for conducting operations, maintenance, and emergency preparedness and response activities were inadequate to ensure safe operation of a pipeline facility. Specifically, PGE's Underground Storage Risk and Integrity Management Plan (USRIMP) did not include a process for using portable concrete pedestals for well signage in lieu of permanent signage in accordance with API RP 1171, Section 10.4.1, *Minimum Signage Information*.¹

During the inspection, CalGEM reviewed PGE's USRIMP, appendix AF and found that PGE did not include a process for using portable concrete pedestals for well signage in lieu of permanent well signage. PGE's McDonald Island has limited space at the well sites. Thus, portable concrete pedestals for well signage are used so they can be temporarily moved while performing well work. The use of portable well signs may result in a well being misidentified without a process to address the handling of the portable well signs.

Therefore, PGE's written procedures required by § 192.12(c) were inadequate. PGE must revise its procedures to address using portable well signage in lieu of permanent signage in accordance with Section 10.4.1.

¹ API RP 1171, Section 10.4.1, Minimum Signage Information

Permanent weatherproof signage shall be installed at each well site for identification purposes....

Response to Item #1:

PG&E's written guidance on UNGS well signage (UGS-AF-S; [Att01-1](#)) has been updated to assure portable pedestal signage is aligned with the proper well.

Item #2:

§ 192.12 Underground natural gas storage facilities.

(a) ...

(c) *Procedural manuals. Each operator of a UNGSF must prepare and follow for each facility one or more manuals of written procedures for conducting operations, maintenance, and emergency preparedness and response activities under paragraphs (a) and (b) of this section. Each operator must keep records necessary to administer such procedures and review and update these manuals at intervals not exceeding 15 months, but at least once each calendar year. Each operator must keep the appropriate parts of these manuals accessible at locations where UNGSF work is being performed. Each operator must have written procedures in place before commencing operations or beginning an activity not yet implemented.*

PGE's written procedures for conducting operations, maintenance, and emergency preparedness and response activities were inadequate to ensure safe operation of a pipeline facility. Specifically, PGE's USRIMP did not include procedures for interacting and communicating with a control room during normal, abnormal, and emergency conditions in accordance with API RP 1171, Sections 11.7.1 and 11.7.2.²

During the inspection, CalGEM reviewed PGE's USRIMP. CalGEM found that PGE did not have guidelines for interaction and communication with a control room to maintain reservoir and well functional integrity during normal, abnormal, and emergency conditions.

Therefore, PGE's written procedures required by § 192.12(c) were inadequate. PGE must revise its procedures to include guidelines for interacting and communicating with a control room to maintain reservoir and well functional integrity during normal, abnormal, and emergency conditions in accordance with Sections 11.7.1 and 11.7.2.

² API RP 1171, Section 11.7.1, General

Storage personnel shall be responsible for preparing and communicating guidelines for maintaining reservoir and well functional integrity.

API RP 1171, Section 11.7.2, Scope of Procedures

The operator should establish procedures for interaction and communication with a control room, including authority for initiating flow, operating, and shutting in natural gas storage facilities as required to maintain reservoir and well integrity during normal, abnormal, and emergency conditions.

Response to Item #2:

PG&E guidance for interaction and communications between PG&E's gas storage facility operators and the Gas Control Center (GCC) during normal, abnormal, and emergency conditions is not found within the RIMP, but rather within facility operational group specific documents as outlined in the table below:

Operational Group	UNGSFs	Document(s)
McDonald Island	McDonald Island	<ul style="list-style-type: none"> ▪ McDonald Island Communications Plan (Att02-1) ▪ McDonald Island Station Operator Roles and Responsibilities (Att02-2)
Los Medanos	Los Medanos & Pleasant Creek	<ul style="list-style-type: none"> ▪ Los Medanos Communications Plan (Att02-3) ▪ Los Medanos Station Operator Roles and Responsibilities (Att02-4)

These central communication documents are integrated with additional focused guidance such as those specific to certain work activities [e.g., Gas Clearances (TD-4441S); [Att02-5](#)] or emergency response [Gas Emergency Response Plan (GERP)(EMER-3003M); [Att02-6](#)].

The UNGSF communication plans guide station operators' interactions and commutations on storage field configurations, injection or withdrawal, desired volumes, forecasted system setups and gas clearances based on operating orders from the GCC to assure reservoir and well integrity during normal, abnormal, and emergency conditions.

Item #3:

§ 192.12 Underground natural gas storage facilities.

(a) ...

(d) *Integrity Management Program*

(1) ...

(4) *Integrity management procedures and recordkeeping. Each UNGSF operator must establish and follow written procedures to carry out its integrity management program under API RP 1171 (incorporated by reference, see § 192.7), section 8 ("Risk Management for Gas Storage Operations"), and this paragraph (d). The operator must also maintain, for the useful life of the UNGSF, records that demonstrate compliance with the requirements of this paragraph (d). This includes records developed and used in support of any identification, calculation, amendment, modification, justification, deviation, and determination made, and any action taken to implement and evaluate any integrity management program element..*

PGE's written procedures for carrying out its integrity management program were inadequate to ensure safe operation of a pipeline facility. Specifically, PGE's USRIMP did not include detailed information about the data used to determine susceptibility to threat and hazard-related events in accordance with API RP 1171, Section 8.3.2.³

During the inspection, CalGEM reviewed PGE's USRIMP. PGE did not list detailed information about the data used to determine susceptibility to threat and hazard-related events or refer to where the specific data is contained.

Therefore, PGE's written procedures required by § 192.12(d)(4) were inadequate. PGE must revise its procedures to include detailed information about the data used to determine susceptibility to threat and hazard-related events in accordance with Section 8.3.2.

³ API RP 1171, Section 8.3.2, Data Sources

The operator shall use available information such as performance data collected through the field history, operations and maintenance (O&M) activities, geotechnical data such as well logs, engineering data, and completion reports to determine susceptibility to threat and hazard-related events and to assess threat and hazard interaction.

Response to Item #3:

PG&E includes detailed information about the data used to determine susceptibility to threat and hazard-related events and to assess threat and hazard interactions within the USRIMP.

PG&E determines susceptibility to threat and hazard-related events and to assess threat and hazard interactions through a well risk assessment and relative risk ranking process (UGS-14B-S; Att03-1). A database is utilized to manage and track the well-by-well risk assessment model data inputs, including those influenced by continuous evaluation (e.g., integrity assessments, operations history, routine maintenance, testing, etc.) as described in UGS-14C-P (Att03-2). Section 4 and section 5 of UGS-14C-P provides guidance on scoring for risk model data inputs including parameter descriptions and source details (e.g., inspection type and/or test(s) to consider per data input scoring). Because detailed descriptions of each risk model data input are broken out within section 4 and section 5 of UGS-14C-P, specific inspection report(s) or testing results can be traced for any individual well to better understand it's risk model scoring.

Item #4:

§ 192.12 Underground natural gas storage facilities.

(a) ...

(d) *Integrity Management Program*

(1)...

(4) *Integrity management procedures and recordkeeping. Each UNGSF operator must establish and follow written procedures to carry out its integrity management program under API RP 1171 (incorporated by reference, see § 192.7), section 8 ("Risk Management for Gas Storage Operations"), and this paragraph (d). The operator must also maintain, for the useful life of the UNGSF, records that demonstrate compliance with the requirements of this paragraph (d). This includes records developed and used in support of any identification, calculation, amendment, modification, justification, deviation, and determination made, and any action taken to implement and evaluate any integrity management program element..*

PGE's written procedures for carrying out its integrity management program were inadequate to ensure safe operation of a pipeline facility. Specifically, PGE's USRIMP did not include wildfires or the single access point to the McDonald Island UNGS facility as threats or hazard in accordance with API RP 1171, Section 8.4.2.⁴

During the inspection, CalGEM reviewed PGE's USRIMP. PGE did not include threats and hazards from wildfires or the single access point to the McDonald Island UNGS facility in its integrity management program.

Therefore, PGE's written procedures required by § 192.12(d)(4) were inadequate. PGE must revise its procedures to include the threats and hazards specified in the previous paragraph in accordance with Section 8.4.2.

⁴ API RP 1171, Section 8.4.2, Methodology

The operator shall evaluate the potential threats and hazards impacting storage wells and reservoirs....

Response to Item #4:

PG&E has updated its Risk Register to include both wildfire and the single access point to McDonald Island (Risk IDs: STO041-S and STO042-S) for review and assessment.

Additionally, existing guidance for wildfire response at storage facilities (TD-4911P-4; Att04-1) is in place to prevent, address, and mitigate the threats and hazards associated with a wildfire.

PG&E believes the four items identified in the NOA have been satisfactorily addressed. Upon completion of your review, PG&E requests notification of closure of this NOA.

The NOA requested that PG&E maintain documentation of the safety improvement costs and submit the total to PHMSA. Negligible costs were involved to revise written guidance on signage (i.e. item #1) and add two risks to our Risk Register (i.e. item #4). Clarification for guidance on interactions and communications (i.e. item #2) and data used in modeling risks (i.e. item #3) was existing therefore involved no changes.

Please contact Justin Leany at (415) 603-9552 or justin.leany@pge.com for any questions you may have regarding this response.

Sincerely,

/s/ Susie Richmond
Manager, Gas Ops Compliance and Risk

cc: Janisse Quinones
Raymond Thierry
Jerrod Meier, PG&E
Lucy Redmond

Attachments :

Att01-1_Well Signage (UGS-AF-S).pdf

*Att02-1_McDonald Island Communications Plan_Redacted.pdf

Att02-2_McDonald Island Roles and Responsibilities.pdf

*Att02-3_Los Medanos Communications Plan_Redacted.pdf

Att02-4_Los Medanos Roles and Responsibilities.pdf

Att02-5_Gas Clearances (TD-4441S).pdf

*Att02-6_Gas Emergency Response Plan (EMER-3003M)_Redacted.pdf

Att03-1_Well Risk Assessment and Relative Risk Ranking (UGS-14B-S).pdf

Att03-2_Relative Risk Ranking of Wells (UGS-14C-P).pdf

Att04-1_Storage Wildfire Response (TD-4911P-04).pdf

* PG&E is providing responsive material that qualifies for confidential treatment under 5 U.S.C. 552(b). Portions of the document have been redacted because confidential information such as Personal Identifiable Information and internal company phone numbers used during emergency response and other operational activities related to Gas Control. This data is critical energy infrastructure data that is defined by the regulations of the Federal Energy Regulatory Commission at 18 C.F.R. § 388.113 and/or General Order 66-D. The basis for seeking confidential treatment for this information the subject information could compromise or incapacitate physically or electronically a facility providing critical utility service; or discusses vulnerabilities of a facility providing critical utility service. See Govt Code § 6254(k), (ab); 6 U.S.C. § 131; 6 CFR §29.2.