

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking on the
Commission's Own Motion to Adopt New
Safety and Reliability Regulations for Natural
Gas Transmission and Distribution Pipelines
and Related Ratemaking Mechanisms

R.11-02-019
(Filed February 24, 2011)

**DECLARATION OF SUMEET SINGH SUPPLEMENTING THE VERIFIED
STATEMENT OF PACIFIC GAS AND ELECTRIC COMPANY'S VICE
PRESIDENT OF GAS TRANSMISSION MAINTENANCE AND CONSTRUCTION
IN RESPONSE TO RULING OF ASSIGNED COMMISSIONER AND ASSIGNED
ADMINISTRATIVE LAW JUDGE**

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PACIFIC GAS AND ELECTRIC COMPANY

Dated: October 18, 2013

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

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ADMINISTRATIVE LAW JUDGE**

I, SUMEET SINGH, do declare:

1. I am the Senior Director of Integrity Management in Gas Operations for Pacific Gas and Electric Company (PG&E). Prior to that I was the Senior Director of Asset Knowledge Management in Gas Operations for PG&E.

2. I received a B.S. in civil engineering from the University of California, Berkeley, in 2000, and a Masters of Business Administration from the University of California, Los Angeles, in 2008. I have been employed by PG&E for a total of 11 years, spending approximately 9 years in gas operations.

3. I am providing this declaration as a supplement to the Verified Statement of M. Kirk Johnson submitted on August 30, 2013 based on the ongoing analysis of documentation and information on Line 147 conducted by David Harrison, a former PG&E pipeline engineer and now a technical consultant working on our maximum allowable operating pressure (MAOP) validation effort. The ongoing work conducted by Mr. Harrison and his team is discussed in paragraphs 39 through 48 of the Verified Statement. I am also providing copies of recent expert reports from Exponent and from Kiefner and Associates.

4. As discussed in the Verified Statement, in early 2013 Mr. Harrison and his team learned that portions of Segments 108 and 108.7 of Line 147 had been cut out as part of the 2011 hydrostatic testing process. Mr. Harrison was able to confirm from photographs of four sections

of pipe that had been cut out of Line 147 in connection with the strength tests that the long seam for two sections of the pipe was DSAW. Another was seamless, and the fourth was SSAW. Based on this, we updated the MAOP validation documentation for Segments 108 and 108.7 to show the SSAW seam type. Despite the fact that destructive testing confirmed a specified minimum yield strength (SMYS) value of 42,000 psi, we reduced the SMYS value of these segments to 33,000 psi in order to reflect a more conservative SMYS value based on the seam type and installation year.

5. At the time PG&E submitted the Verified Statement, our best available information indicated that while the updated SMYS value did affect the MAOP for the two segments (reduced from 525 psig to 412 psig), these segments were still commensurate with an MAOP of 365 psig. This was based upon, among other things, the conservative SMYS value of 33,000 psi, a wall thickness of 0.3125 inches, and a design factor of 0.5 for a class 3 location.

6. The wall thickness of 0.3125 inches was derived from a 1957 strength test pressure report, the bill of material for performing the hydrostatic testing in 2011, the drawing detail from the 2011 hydrostatic testing that corresponds to the bill of material, and the associated record of material removed form (chain of custody form). A copy of the 1957 strength test pressure report is attached as Exhibit A.

7. Prior to submitting the Verified Statement, we had an "H form" dated December 2, 2011, from a contractor involved with our pressure testing work. The H form was associated with mile point 1.89 that corresponded to segment 107.7 and identified 20 inch diameter pipe with a wall thickness between 0.261 inches and 0.275 inches. It also indicated that the seam type for this pipe was DSAW. A copy of this H form is attached as Exhibit B. Once we confirmed that segment 107.7 pipe was 24 inch diameter pipe and not 20 inch pipe as indicated on the H-form, we discounted this H form due to the inaccuracy and were uncertain of the location due to the incorrect mile point information. We continued to rely on the documentation of 0.3125 inches of wall thickness described in paragraph 6 above for segments 108 and 108.7, although we have also continued to analyze our records for Line 147 and for our entire system.

8. PG&E's review of its records and examination of pipe has been ongoing, and did not end while PG&E was preparing the Verified Statement. We have continued to gather, review and analyze additional information about Line 147. Attached as Exhibit C is a report prepared by PG&E's Applied Technology Services (ATS) Department dated August 29, 2013. ATS performed ultrasonic measurements of the wall thickness of the pipe cutout stored in our Modesto pipe storage yard. This test indicated a pipe wall thickness range of 0.25 inches (from 0.247 inches to 0.258 inches) for pipe believed to be for segment 108, rather than 0.3125 inches as was previously identified on the records. After receipt of this report, we double-checked to confirm that ATS had tested the correct pipe sample, which was confirmed last month.

9. In addition, on August 27, 2013, PG&E received a revised H form from the contractor for the pressure testing work. The revised H form changed the mile point, which now associated it with Segment 108, and also changed the seam type, but did not change its wall thickness measurements. Given the number of changes to the H form, PG&E conducted additional diligence to ensure the correct location and data accuracy by discussing these changes further with our pressure testing team. A copy of this revised H form is attached as Exhibit D. The updated seam type on this form shows A.O. Smith pipe. However, we believe the seam type is actually SSAW, based on a review performed by Michael Rosenfeld of Kiefner and Associates. Both A.O. Smith and SSAW pipe have a joint efficiency factor of 0.8, so this difference in the seam type does not affect the MAOP.

10. Given the updated information from two sources consisting of the ATS report (Exhibit C) and revised H form (Exhibit D), PG&E has applied a conservative representation for the entire length of segments 108 and 108.7 by using a wall thickness of 0.250 inches instead of 0.3125 inches and thus the MAOP for both of these segments would be 330 psig, not 412 psig as described in paragraphs 48 and 49 of the Verified Statement. The MAOP for the entire line remains at 330 psig.

11. On September 13, 2013, I submitted a Declaration supplementing the Verified Statement by submitting reports from Anamet, Inc. concerning the metallurgical evaluation of

the pipe where the leak that was found in October 2012 on Line 147, Segment 109. PG&E also retained Exponent to conduct an analysis to identify why the October 2012 leak on Line 147, Segment 109 was not detected during the hydrotest. Exponent conducted visual, metallographic, fractographic, and chemical analysis of the leak site. Exponent concluded that “[t]he subject leak was caused by cracking that occurred within a location on the pipe body that had been repaired using a weld-metal deposition (‘weld repair’). This weld repair was not associated with either a girth or longitudinal seam weld.” Moreover, Exponent found “no metallographic or fractographic evidence that any crack growth occurred following the repair weld. Specifically, there was no evidence of progressive crack growth due to fatigue, stress corrosion cracking (SCC) or ductile tearing[.]” The Exponent report is attached as Exhibit E.

12. PG&E also retained Kiefner and Associates to determine whether the hydrostatic pressure tests on Line 147 still established Line 147’s fitness for service. Kiefner and Associates conclude that Line 147 is safe to operate. For convenience and clarity, I am quoting the conclusions of Kiefner and Associates in full below:

1. PG&E has substantial knowledge of the type of pipe, construction features, and appurtenances present in Line 147. Data from metallurgical examination of a leak that occurred in 2012 suggests that the affected pipe was reconditioned first-generation A.O. Smith line pipe. Records indicate that such pipe was shipped to the site in 1957, although it is not listed in the PFL, confirming that the database is not perfect.
2. The October 2011 hydrostatic pressure spike test confirmed the fitness for service of the pipeline for its MAOP without doubt. The concept of pressure testing to establish the ability of a pipeline to safely hold pressure at a lower pressure is an accepted practice that is logical and supported by industry experience and research. NTSB and PHMSA have recommended and required, respectively, hydrostatic pressure testing to revalidate pipeline operating pressures. The test was performed to a sufficient margin to assure the integrity of the pipeline well into the future assuming routine maintenance practices such as cathodic protection monitoring and damage prevention programs continue to be implemented.
3. A review of data concerning specific pipeline integrity threats provides no evidence that the integrity or fitness for service of Line 147 has degraded in the 2 years since the October 2011 hydrostatic tests were conducted.

In addition, Kiefner and Associates' letter states, "The fact that PG&E may not know all facts about every piece of pipe or component in Line 147 does not cause me particular concern considering that the pipeline in its current condition was successfully pressure tested to a level that supports a maximum allowable operating pressure (MAOP) of 400 psig." A copy of the Kiefner and Associates report is attached as Exhibit F.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 18th day of October 2013, at San Ramon, California.



SUMEET SINGH, Senior Director
Integrity Management
PACIFIC GAS AND ELECTRIC COMPANY

EXHIBIT A

DEPARTMENT OF GAS OPERATIONS

FIELD PRESSURE TEST REPORT
(Per ASA B 31.1.8 - 1955 Code for Pressure Piping, Paragraph 841.4)

Date October 2, 1957

G.M. No. 139349

1. Project Description: Relocate 24" Main 147, Brittan Avenue, San Carlos

2. Pipeline Data:	<u>Size</u>	<u>Wall Thickness</u>	<u>Steel Specifications</u>
(a) Mainline	<u>20"</u>	<u>0.3125</u>	<u>API 5LX, Gr x 42</u>
(b) Design Operating Pressure, maximum		<u>500</u> psi	psi
(c) Stress at Max. D.O.P.	<u>16,000</u> psi; as % of yield		<u>32.1</u>
	psi; " " " "		
(d) Location class	<u>3</u>	Type construction	<u>C</u>
	"	"	
(e) Test pressure	<u>750</u> psi; fluid	<u>Water</u>	Period of test <u>1 hour</u>
	psi; "	"	" " "
(f) Stress at Test Pressure	<u>24,000</u> psi; as % of yield		<u>57.2</u>
	psi; " " " "		

3. Test Data

(a) Date and time started test 10-21-57 1:20 PM, fluid used Water

(b) Date and time reached test pressure 10-21-57 4:00 PM

(c) Date and time concluded test 10-21-57 5:15 PM, actual test pressure 750 #

(d) Date and time Purging started 10-29-57 10:50 AM concluded 10:55 AM

(e) Date and time Pipeline tied into System 10-29-57 2:00 PM

(f) Date and time Pipeline Placed in Operation 10-29-57 3:00 PM

(g) Name of PG&E Supervisor conducting test Wm. Mendonca

(h) Who made test? P. G. & E. Co.

General Construction Department XXX
 Division - _____
 Contractor (Indicate Name) - _____

Instructions:

Retain one copy of this completed test report in Project file.
 Send one copy each to V.P. in Charge of Gas Operations and to
 Division Manager concerned.

EXHIBIT B

IN-FIELD SERVICES
GEIS Pipeline Integrity Team NDE

Pacific Gas & Electric Company

Hydrostatic Test Dig from October 7, 2011 to November 5, 2011

T43A/B_L147_B_MP-1.89

Documents Contained Within:

H-Form Report T43A/B_L147_B MP-1.89

NDE Reports of T43A/B_L147_B MP-1.89

Photo Report of T43A/B_L147_B MP-1.89

Authors: H. Mayer & J. Hayes

Date: December 2, 2011



Form H: Direct Examination Data Sheet - Page 1 of 10

<u>DA/ILI</u>		<u>DA</u>		<u>ILI</u>	
Route Number:	L-147	Site Designation:	T43A/B_B	ILI Log Distance:	NA
Date of Excavation:	10/7/2011	N-Segment:	NA	RMP-11 Ref. Section:	Table 5.6.2
Mile Point:	1.89	IMA Number:	NA	Reference Girth Weld:	NA
Examination Performed By:	H. Mayer/J. Hayes	Region Number:	NA	Distance From Girth Weld:	NA
PG&E Project Manager:	Donovan Fink	Subregion # (ICDA):	NA		
Approved By:	Kenji Gailey	Stationing:	NA		
Order Number:	41497360				

Excavation Priority:
 Immediate Scheduled (For ILI - 1 Year Other
 Monitor Effectiveness Hydro Test

Excavation Reason
 ECDA ILI Recoat
 ICDA Other NA

If practical, take P/S or CIS reads before excavation: NA

Excavation Details: U/S Ditch Start GPS Coordinates (Uncorrected Field Measurement)
 Northing: 37.4878247306 PDOP: NA
 Easting: -122.2701986194 Acc-: NA
 Planned Excavation Length (Ft.): NA
 Actual Excavation Length (Ft.): 21.0ft

Centerline GPS Coordinates (Uncorrected Field Measurement)
 Northing: NA PDOP: NA
 Easting: NA Acc-: NA
 GPS File Name: Guida 148T4313

D/S Ditch End GPS Coordinates (Uncorrected Field Measurement)
 Northing: 37.4878664944 PDOP: NA
 Easting: -122.2702163300 Acc-: NA

1.0 Data Before Coating Removal

1.1 **Native Soil Type:** Clay Rock Sand Loam Wet Other NA
 1.1A **Backfill Material Found:** Silt Slurry Native Depth of Cover (Ft.): 6.00ft

Comments: NA

1.2 **Coating Type:** HAA Somatic Plastic Tape Wax Tape FBE Powercrete
 Bare/None Coal Tar Other: NA Comments: NA
 Coating Thickness (Inches): 0.250in Number of Layers: 2

1.3 **Holiday Testing Performed?:** Yes No Voltage Used: NA Map Location of Holidays Below:
 Device Used: Coil Wet Sponge Comments: NA

1.4 **Pipe-to-Soil Potentials in Ditch (-mV):**
 US: 12:00 -526 3:00 -530 6:00 -535 9:00 -526
 DS: 12:00 -661 3:00 -658 6:00 -640 9:00 -663
 Comments: CP appears to be very low, may be turned off at time of inspection.

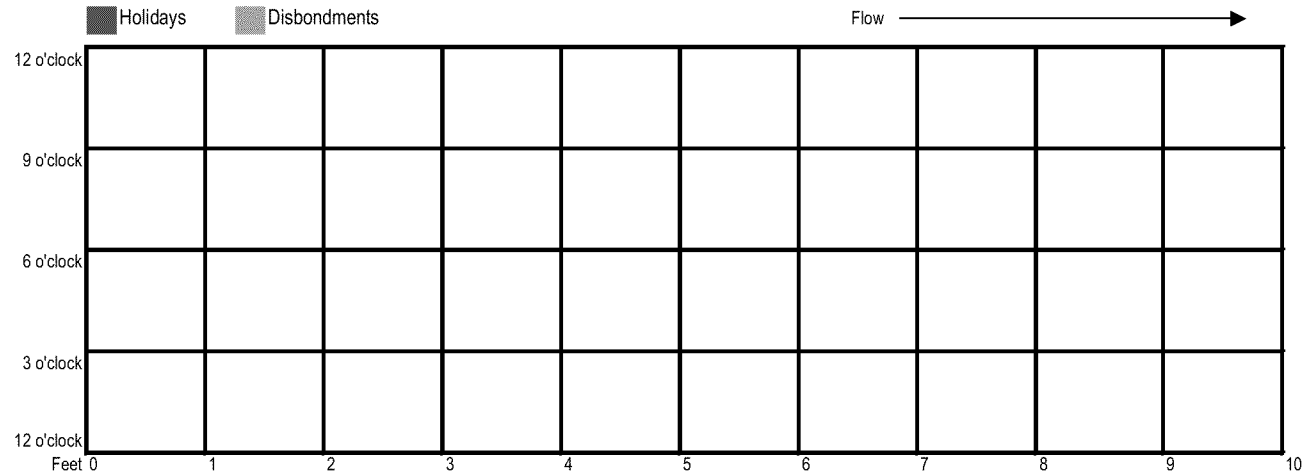
1.5 **Soil Resistivity in Ditch (Ω-cm):**
 Method: 4-Pin 24469.5 ohm/cm Soil Box NA
 Comments: NA SRM-100 US: N/A DS: N/A

1.6 **Soil Sample Location** Comments: Ditch end (DS) 6:00 position under pipe.

1.7 **Ground Water Present?:** Yes No Sample(s) Collected?: Yes No Sample pH: NA
 Comments: NA

1.8 **Coating Condition:** Good - Adhered to Pipe Fair - Coating Partially Disbonded or Degraded
 Poor - Coating Significantly Disbonded or Missing
 Comments: Coating removed & tie in weld areas blasted. Pipe section removed and test pipes installed. Removed pipe section was also assessed and was in good conition except for coating damage from removal and transportation. See comments page 10.

1.9 **Map of Coating Degradation*:** Zero Reference Point: US Exposed Pipe 360 degrees
 *Note any calcareous deposit locations



CaCO3	- Calcareous deposits containing calcium
FeO	- General iron oxide with scale
3 FeCO3	- Calcareous deposits containing iron

Form H: Direct Examination Data Sheet - Page 2 of 10

DA/ILI		DA		ILI	
Route Number:	L-147	Site Designation:	T43A/B_B	ILI Log Distance:	NA
Date of Excavation:	10/7/2011	N-Segment:	NA	RMP-11 Ref. Section:	Table 5.6.2
Mile Point:	1.89	IMA Number:	NA	Reference Girth Weld:	NA
Examination Performed By:	H. Mayer/J. Hayes		NA	Distance From Girth Weld:	NA
PG&E Project Manager:	Donovan Fink	Region Number:	NA		
Approved By:	Kenji Gailey	Subregion # (ICDA):	NA		
Order Number:	41497360	Stationing:	NA		

1.10 Photos Taken?: Yes No
 *See Photo Log for additional information.

1.11 Coating Sample Taken?: Yes No Location of Sample: _____ NA

1.12 Liquid Underneath Coating?: Yes No If Yes, pH of Liquid: _____ NA

1.13 Corrosion Product Present?: Yes No If Yes, Was Sample Taken?: Yes No
 Comments: _____ NA

1.14 Soil pH (Sb Electrode): Upstream: _____ 6.0 Downstream: _____ 7.5 Pipe pH: _____ 6.0

2.0 Data After Coating Removal

2.1 Pipe Temperature (°F): _____ 60.0° F Measured Pipe Diameter (In.): _____ 63" = 20.05"

2.2 Weld Seam Type: DSAW SSAW ERW SMLS
 Spiral Lap Flash AO Smith IF CAN'T DETERMINE, VISUALLY PERFORM MACROETCH & LOCATE

2.3 Girth Weld Coordinates & Identify Type (See Table 5.7.3):
 Northing: _____ NA PDOP: _____ NA
 Easting: _____ NA Acc-: _____ NA
 Elevation: _____ NA LS Weld Clock Position(s): _____ 8:55

2.4 Damage Found:
 Corrosion Damage Yes No Mechanical Damage Yes No
 Other Damage: _____ Non relevant tool marks, no corrosion found greater than 20%

2.5 UT Wall Thickness Measurements:

	US / DS		US / DS		US / DS		US / DS
TDC:	0.270"/0.275"	1 O'clock	0.267"/0.272"	2 O'clock	0.267"/0.271"	3 O'clock	0.265"/0.271"
4 O'clock	0.268"/0.270"	5 O'clock	0.266"/0.271"	6 O'clock	0.268"/0.273"	7 O'clock	0.266"/0.272"
8 O'clock	0.269"/0.269"	9 O'clock	0.261"/0.263"	10 O'clock	0.266"/0.264"	11 O'clock	0.269"/0.270"

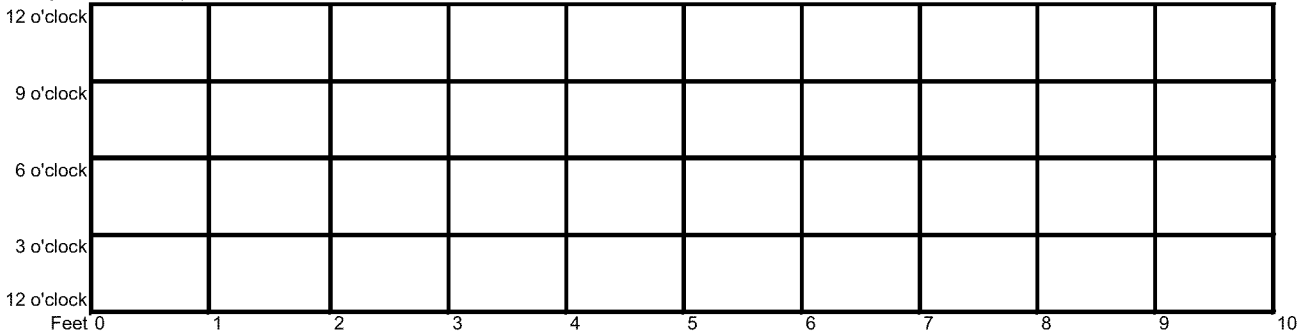
UT Wall Thickness Grid @ 6:00 is required. Be sure to attach grid to H-Form electronically. See page 6 of 10.

2.6 Wet Fluorescent Mag. Part. Is Required. Comments: _____ 2 linear indications on the removed pipe section. See MT & Photo report.
 Were there any linear indications? Yes No If Yes, attach NDE report electronically as part of the H-Form.
 Report to include black light and white light photos of indications.

2.7 Take Photos to Document Corrosion and Other Anomalies*
 *See Photo Log for additional information.

2.8 Overview Map of Corroded Area*:
 *See Pit Depth Measurement Grid for additional Information Zero Reference Point: _____ US Exposed Pipe 360 degrees

*Note any calcareous deposits.



Form H: Direct Examination Data Sheet - Page 3 of 10

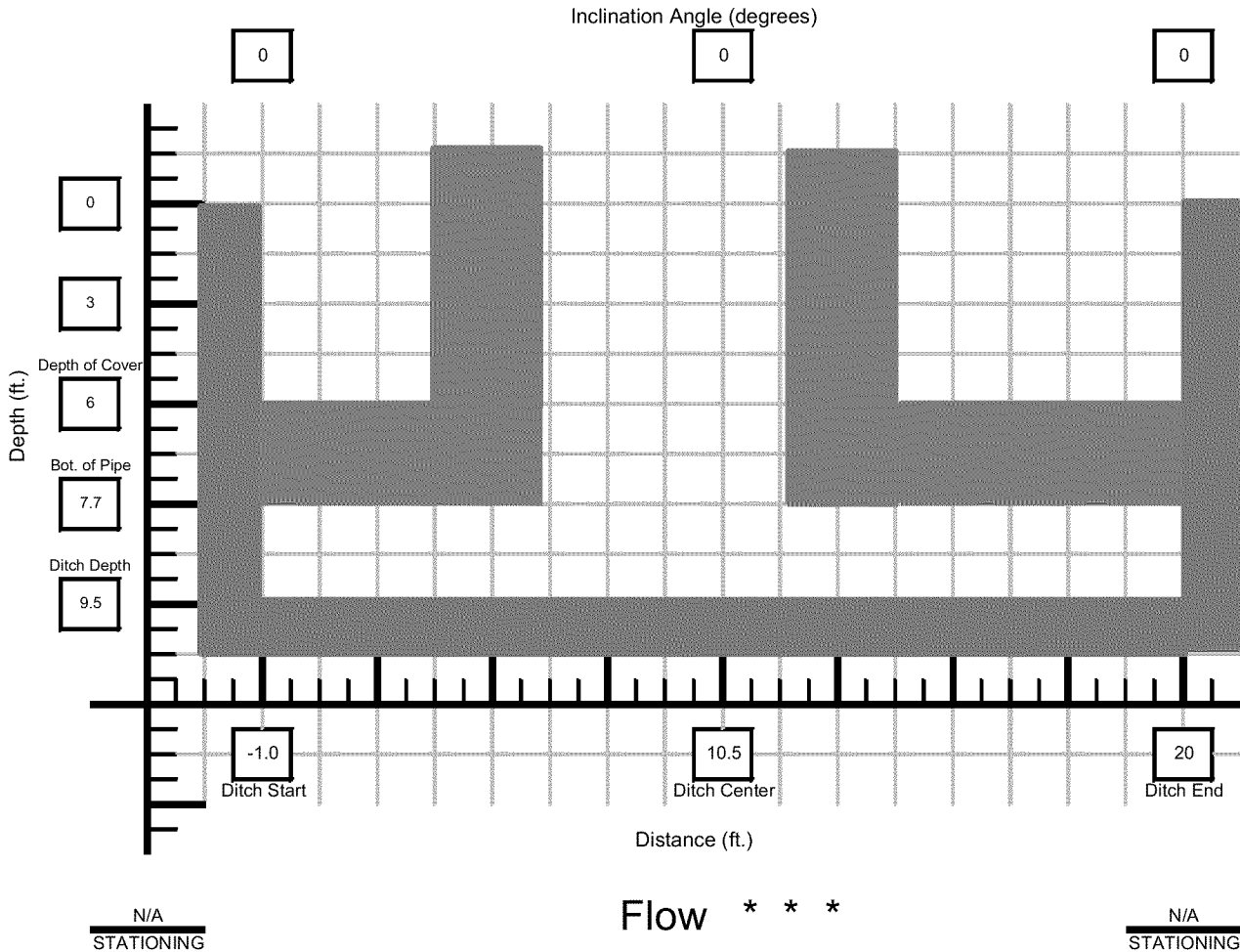
DA/ILI
 Route Number: L-147
 Date of Excavation: 10/7/2011
 Mile Point: 1.89
 Examination Performed By: H. Mayer/J. Hayes
 PG&E Project Manager: Donovan Fink
 Approved By: Kenji Gailey
 Order Number: 41497360

DA
 Site Designation: T43A/B_B
 N-Segment: NA
 IMA Number: NA
 Region Number: NA
 Subregion # (ICDA): NA
 Stationing: NA

ILI
 ILI Log Distance: NA
 RMP-11 Ref. Section: Table 5.6.2
 Reference Girth Weld: NA
 Distance From Girth Weld: NA

Excavation Drawing:

At minimum draw pipe elevation profile and indicate stationing of 1) low point and 2) critical inclination angle. Place an arrow on the drawing indicating direction of gas flow in the region(s). Other labels may also be added (e.g. "to Station").



NOTES: (Record stationing and names of nearby landmarks such as creeks and roads. Provide any additional information that may help in spatially positioning pipe):

**See attached Delorme screen shot on page 11.

EXTERNAL PIT DEPTH MEASUREMENT GRID SHEETS

DA/ILI
 Route Number: L-147
 Date of Excavation: 10/7/2011
 Mile Point: 1.89
 Examination Performed By: H. Mayer/J. Hayes
 PG&E Project Manager: Donovan Fink
 Approved By: Kenji Gailey
 Order Number: 41497360

DA
 Site Designation: T43A/B_B
 N-Segment: NA
 IMA Number: NA
 Region Number: NA
 Subregion # (ICDA): NA
 Stationing: NA

ILI
 ILI Log Distance: NA
 RMP-11 Ref. Section: Table 5.6.2
 Reference Girth Weld: NA
 Distance From Girth Weld: NA

	.001 - .009
	.010 - .099
	.100 - .199
	.200 - .299
	Highest pit reading

Grid Size = _____ Inch x _____ Inch (specify grid size)
 Clock Position (specify below)

Anomaly # NA Grid # NA

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
A																						
B																						
C																						
D																						
E																						
F																						
G																						
H																						
I																						
J																						
K																						
L																						
M																						
N																						
O																						
P																						
Q																						
R																						
S																						
T																						
U																						
V																						
W																						
X																						

PIT DEPTH GRID 1 OF 2

EXTERNAL PIT DEPTH MEASUREMENT GRID SHEETS

DA/ILI
 Route Number: L-147
 Date of Excavation: 10/7/2011
 Mile Point: 1.89
 Examination Performed By: H. Mayer/J. Hayes
 PG&E Project Manager: Donovan Fink
 Approved By: Kenji Gailey
 Order Number: 41497360

DA
 Site Designation: T43A/B_B
 N-Segment: NA
 IMA Number: NA
 Region Number: NA
 Subregion # (ICDA): NA
 Stationing: NA

ILI
 ILI Log Distance: NA
 RMP-11 Ref. Section: Table 5.6.2
 Reference Girth Weld: NA
 Distance From Girth Weld: NA

	.001 - .009
	.010 - .099
	.100 - .199
	.200 - .299
	Highest pit reading

Grid Size = _____ Inch x _____ Inch (specify grid size)
 Clock Position (specify below)

Anomaly # NA Grid # NA

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
A																						
B																						
C																						
D																						
E																						
F																						
G																						
H																						
I																						
J																						
K																						
L																						
M																						
N																						
O																						
P																						
Q																						
R																						
S																						
T																						
U																						
V																						
W																						
X																						

PIT DEPTH GRID 2 OF 2

INTERNAL CORROSION WALL LOSS GRID

DA/ILI	DA	ILI
Route Number: L-147	Site Designation: T43A/B_B	ILI Log Distance: NA
Date of Excavation: 10/7/2011	N-Segment: NA	RMP-11 Ref. Section: Table 5.6.2
Mile Point: 1.89	IMA Number: NA	Reference Girth Weld: NA
Examination Performed By: H. Mayer/J. Hayes	Region Number: NA	Distance From Girth Weld: NA
PG&E Project Manager: Donovan Fink	Subregion # (ICDA): NA	
Approved By: Kenji Gailey	Stationing: NA	
Order Number: 41497360		

Grid Size = 1 Inch x 1 Inch

Clock Position (specify below)

All measurements are in inches.

UT Grid is centered @ 6:00 position on pipe.

	1	2	3	4	5	6	7	8	9	10	11	12
A	0.251"	0.251"	0.249"	0.249"	0.249"	0.249"	0.249"	0.248"	0.248"	0.248"	0.248"	0.248"
B	0.251"	0.254"	0.251"	0.251"	0.249"	0.249"	0.249"	0.249"	0.248"	0.248"	0.248"	0.249"
C	0.253"	0.251"	0.251"	0.251"	0.251"	0.251"	0.251"	0.249"	0.249"	0.248"	0.249"	0.249"
D	0.251"	0.251"	0.251"	0.251"	0.251"	0.249"	0.250"	0.249"	0.249"	0.248"	0.247"	0.249"
E	0.251"	0.251"	0.251"	0.251"	0.251"	0.251"	0.251"	0.251"	0.247"	0.248"	0.247"	0.248"
F	0.251"	0.251"	0.251"	0.251"	0.249"	0.249"	0.251"	0.249"	0.249"	0.247"	0.248"	0.249"
G	0.251"	0.251"	0.247"	0.246"	0.249"	0.248"	0.247"	0.247"	0.246"	0.247"	0.248"	0.247"
H	0.248"	0.249"	0.249"	0.249"	0.248"	0.247"	0.247"	0.247"	0.246"	0.246"	0.246"	0.246"
I	0.249"	0.249"	0.249"	0.249"	0.247"	0.246"	0.244"	0.247"	0.244"	0.244"	0.247"	0.246"
J	0.247"	0.247"	0.247"	0.246"	0.246"	0.246"	0.242"	0.244"	0.244"	0.243"	0.244"	0.246"
K	0.247"	0.247"	0.247"	0.246"	0.246"	0.246"	0.244"	0.244"	0.244"	0.244"	0.244"	0.246"
L	0.249"	0.247"	0.247"	0.247"	0.248"	0.248"	0.248"	0.242"	0.244"	0.244"	0.246"	0.244"

INTERNAL CORROSION GRID

Form H: Direct Examination Data Sheet - Page 10 of 10

DA/ILI
 Route Number: L-147
 Date of Excavation: 10/7/2011
 Mile Point: 1.89
 Examination Performed By: H. Mayer/J. Hayes
 PG&E Project Manager: Donovan Fink
 Approved By: Kenji Gailey
 Order Number: 41497360

DA
 Site Designation: T43A/B_B
 N-Segment: NA
 IMA Number: NA
 Region Number: NA
 Subregion # (ICDA): NA
 Stationing: NA

ILI
 ILI Log Distance: NA
 RMP-11 Ref. Section: Table 5.6.2
 Reference Girth Weld: NA
 Distance From Girth Weld: NA

3.0 RECOAT DATA

3.1 Sandblast Media: Sharp Shot 30/60 Anchor Profile Measurement: Average: 3.2 mils

3.2 Pipe Recoated With:
 Powercrete J Poly Tape Bar-Rust 235 Dev Grip 238 Dev Tar 247 Protal 7200 PE Tape

3.3 For Epoxy Coating Systems, Record Environmental Condition:
 Air Temperature: 62.4°F Dew Point: 45.1°F
 Pipe Temperature: 67.0°F Relative Humidity: 51.4%
 Time of Day: 12:30 pm

3.4 Repair Coating Hardness (If ARC Coating):

US	3:00 -	<u>82</u>	6:00 -	<u>79</u>	9:00 -	<u>79</u>	12:00 -	<u>79</u>
DS	3:00 -	<u>79</u>	6:00 -	<u>75</u>	9:00 -	<u>79</u>	12:00 -	<u>81</u>

3.5 Measured Coating Thickness:

US	3:00 -	<u>33.7</u>	6:00 -	<u>38.7</u>	9:00 -	<u>57.5</u>	12:00 -	<u>27.4</u>
DS	3:00 -	<u>37.3</u>	6:00 -	<u>28.6</u>	9:00 -	<u>39.0</u>	12:00 -	<u>29.3</u>

Holiday Tested?: Yes No
 Device Used: Coil Wet Sponge Voltage Used: UNK Repair All Holidays. YES

3.6 Coupon Test Station Installed?: Yes No ETS Installed?: Yes No
 If Yes, Date Installed: NA

Surface Configuration: Fink G-5 Box Carsonite Other: NA

3.7 Backfill Material: Native Imported Sand Other: NA

Coating Protections?: Yes No
 If Yes, Check One: Rockguard Tuf-E-Nuf Conwed Other: STACguard (transitions only)

3.8 Pipe-to-Soil Readings Over Bell Hole After Backfill: NA
 *If specified, a CIS should be done for approximately 100' on either side of the bell hole. Attach data.
 Comments: NA

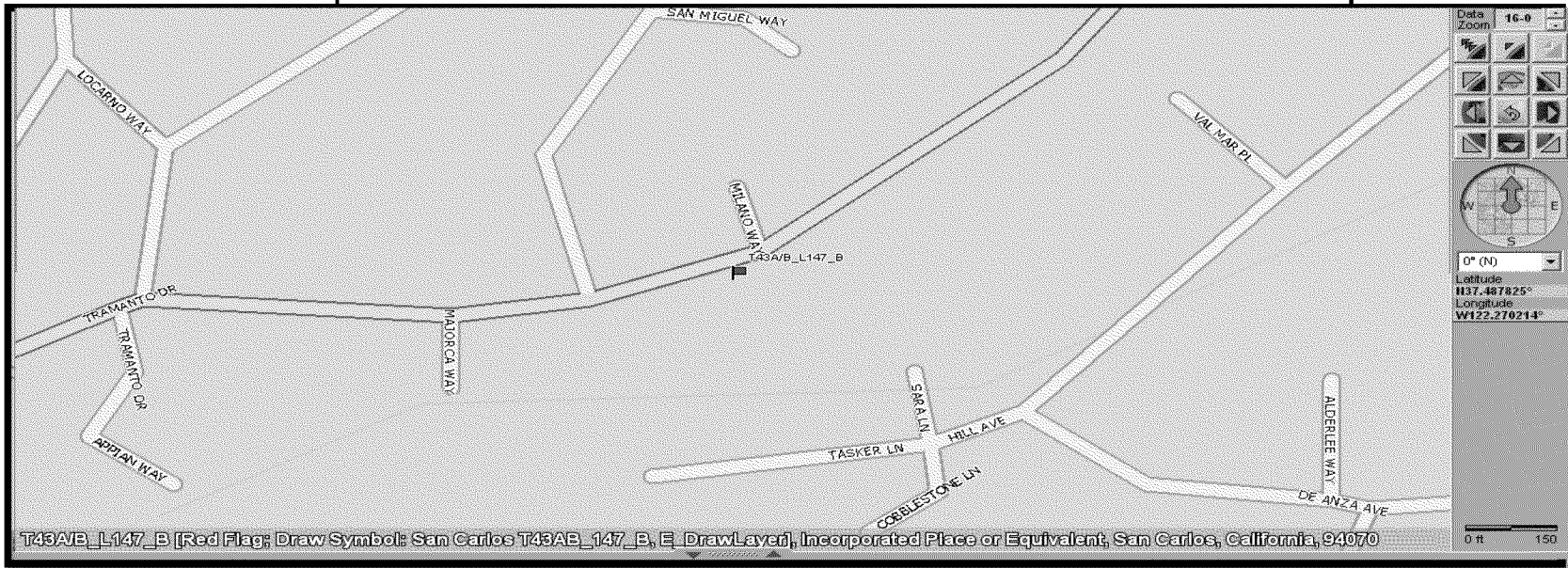
3.9 Attach site sketch of excavation site.

4.0 REPAIR DATA

4.1 Repair Made: Yes No 4.2 Number of Repair Made: Replacement "In-Kind configuration"
 4.3 Repair Type: Metallic Sleeve Non Metallic Sleeve Replace Can Filler Metal Other
 4.4 Damage Repaired: Corrosion Mechanical Other

Misc. Comments/Information: T43A had coating removed, area for inspection was blasted from coating up to test pipe tie in weld. About 1 ft of coating was inspected. T43B had coating removed, area for inspection was blasted from coating up to test pipe tie in weld. About 1.5 ft of coating was inspected. Removed pipe section was inspected at the PG&E yard.

T43A/B_L147_B_MP-1.89



GE Energy
INSPECTION & LIFE EXTENSION SERVICES

MAGNETIC PARTICLE EXAMINATION REPORT							<input type="checkbox"/> Nuclear		<input checked="" type="checkbox"/> Non-Nuclear	
To: Pacific Gas & Electric Company					From: H. Mayer/J. Hayes		Date: 10/7/2011			
Project: T43A/B_L147_B_MP-1.89										
Purchase Order No: 41497360					GEIS Job No: LAPI0015					
Item	Weld	Structural	Casting	Machinery	Mach. Parts	Pipe	N/A	Other: N/A		
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>			
Material	Non-Weld	Plate	Pipe	Bar	Casting	Mach. Parts	N/A	Other: N/A		
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Material	Size 20"	Material Thickness 0.250"	Type of Base Material Carbon Steel		Type of Filler Material C/S Smooth		Weld	<input checked="" type="checkbox"/> N/A	<input type="checkbox"/> As Welded <input type="checkbox"/> As Welded	
Location	70.6 Ft SW of the intersection of Brittan Ave and Milano Way in San Carlos, CA 94070				System L-147					
Acceptance Standards	Customer Specifications				Procedure GEIS QCP # 500 Rev 17					
Type of Check	Initial	Plate Edge	In Process	Back Gouge	Root Pass	Repair	12 Hour	24 Hour	Final	
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Type of Inspection	<input type="checkbox"/> Longitudinal	<input type="checkbox"/> Coil	<input type="checkbox"/> DC Probe		<input checked="" type="checkbox"/> Continuous		Other:			
	<input checked="" type="checkbox"/> Wet	<input type="checkbox"/> Dry	<input type="checkbox"/> Direct Contact		<input checked="" type="checkbox"/> Residual					
	<input type="checkbox"/> Circular	<input type="checkbox"/> AC Prod	<input checked="" type="checkbox"/> Yoke		<input type="checkbox"/> Other					
	MT Yoke & Model - Serial No. / Blacklight Model - Serial No. Parker DA-400 - S# 18830 / Spectroline BIP - S# 1597251					Surface Preparation Method Abrasive Blasting (Kleen Blast) - NACE 2 Finish				
Inspection Medium / Color / Batch No. Magnaglo 14A / Fluorescent Green / 09M12K					Demagnetization Method / Equipment N/A					
Reference: Summary <input checked="" type="checkbox"/> See Attachment							Results of Inspection			
The following areas were requested to be inspected:							- No relevant indications found @ time of insp.			
Bare pipe: -0.40' to 1.35' from original U/S ditch start.							- No relevant indications found @ time of insp.			
Bare pipe : 17.4' to 18.45' from original U/S ditch start.							2 Linear indications were found.			
Removed pipe section.										
Summary:										
Lin-01: Axial Start=1.60' (From U/S end of pipe), AL=1.58" , CW=0.020" , CLK Position= 4:00										
Lin-02: Axial Start=2.33' (From U/S end of pipe), AL=1.20" , CW=0.020" , CLK Position= 4:06										
These are on the removed pipe section.										
Indications were on the removed pipe section. Please see attached photo report for additional information.										
Copy To: <i>Pacific Gas & Electric Company</i> <i>GE Inspection Services (Los Angeles)</i>					Requested By: David Aguiar			Reported By (Technician): H. Mayer/J. Hayes		
					<input checked="" type="checkbox"/> Customer Specifications			NDT supervisor:		
					<input checked="" type="checkbox"/> Accept <input type="checkbox"/> Reject			Andre J. Filiatraut		

NOTICE: THIS EXAMINATION REPORT IS A REPORT OF THE RESULTS OF THE NDT PROCEDURE ACTUALLY PERFORMED BY THIS COMPANY IT IS SUBJECT TO THE LIMITATIONS OF THE TESTING SPECIFICATIONS AND PROCEDURES WHICH WERE UTILIZED. BY FURNISHING THIS REPORT, **GE INSPECTION & LIFE EXTENSION SERVICES** DOES NOT GUARANTEE ANY CONDITION OF THE TESTED SPECIMEN.



GE Energy
Inspection & Life Extension Services

ULTRASONIC EXAMINATION REPORT						<input type="checkbox"/> Nuclear	<input checked="" type="checkbox"/> Non-Nuclear	
To: Pacific Gas & Electric Company			From: H. Mayer & J. Hayes		Date: 10/7/2011			
Project: T43A/B_L147_B_MP-1.89								
Purchase Order No: 41497360				GEIS Job No: LAPI0015				
Item	Weld <input checked="" type="checkbox"/>	Structural <input type="checkbox"/>	Casting <input type="checkbox"/>	Machinery <input type="checkbox"/>	Mach. Parts <input type="checkbox"/>	Pipe <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	Other:
	Non-Weld <input checked="" type="checkbox"/>	Plate <input type="checkbox"/>	Pipe <input type="checkbox"/>	Bar <input type="checkbox"/>	Casting <input type="checkbox"/>	Mach. Parts <input type="checkbox"/>	N/A <input type="checkbox"/>	Other:
Material	Size: 20"	No. of Pieces: 1	Type of Base Metal: Carbon Steel	Type of Filler Material: C/S		Weld <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Smooth <input type="checkbox"/> As Welded	
Location	70.6 Ft SW of the intersection of Brittan Ave and Milano Way in San Carlos, CA 94070				System: L-147			
Acceptance Standards	Customer Specifications				Procedure: QCP-601			
Type of Inspection	Soundness <input checked="" type="checkbox"/>	Thickness <input checked="" type="checkbox"/>	Bond <input type="checkbox"/>	Transducer: <input checked="" type="checkbox"/> Single Crystal <input type="checkbox"/> Dual Crystal		Transducer Serial No.: 020HFC		
	Pulse Echo <input checked="" type="checkbox"/>	Angle-Beam <input type="checkbox"/>	Other <input type="checkbox"/>	Frequency: 5 MHz	Size: 0.375"	Angle: 0°	Couplant / Batch # Sonatest Ultragel II / 25-901 07225 AF	
	UT Equipment/Model: USN-60			Flat <input checked="" type="checkbox"/>	Concave <input type="checkbox"/>	Convex <input type="checkbox"/>	Serial No.:	
	Serial # 01NLKN			Standard	Material	Notch Depth	Serial No.:	
	Calibration Date: 10/5/2011			Step Wedge <input checked="" type="checkbox"/>	Material	Thickness Range: 0.200" - 0.500"	Serial No.:	
	Calibration Due: 1/5/2012			Tube Wedge <input type="checkbox"/>	C/S		V34693	
Reference: Summary <input checked="" type="checkbox"/> See Attachment						Results of Inspection:		
<p>The following areas were requested to be inspected:</p> <p>12" x 12" (1"x1" grid) at a random 6:00 position on the pipe.</p> <p>12" lamination scans at cut-line locations.</p> <p>Thickness readings US & DS inspection areas at the clock positions.</p> <p>** Please see attached reports for additional information.</p>						No relevant indications @ time of inspection.		
						No relevant indications @ time of inspection.		
						No relevant indications @ time of inspection.		
Copy To: <i>Pacific Gas & Electric Company</i> GE Inspection Services (Los Angeles)			Requested By: David Aguiar		Reported By (Technician): H. Mayer/J. Hayes			
			<input checked="" type="checkbox"/> Customer Specifications		NDT Supervisor:			
			<input checked="" type="checkbox"/> Accept <input type="checkbox"/> Reject		Andre J. Filiatraut			

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Topography looking upstream



Topography looking downstream



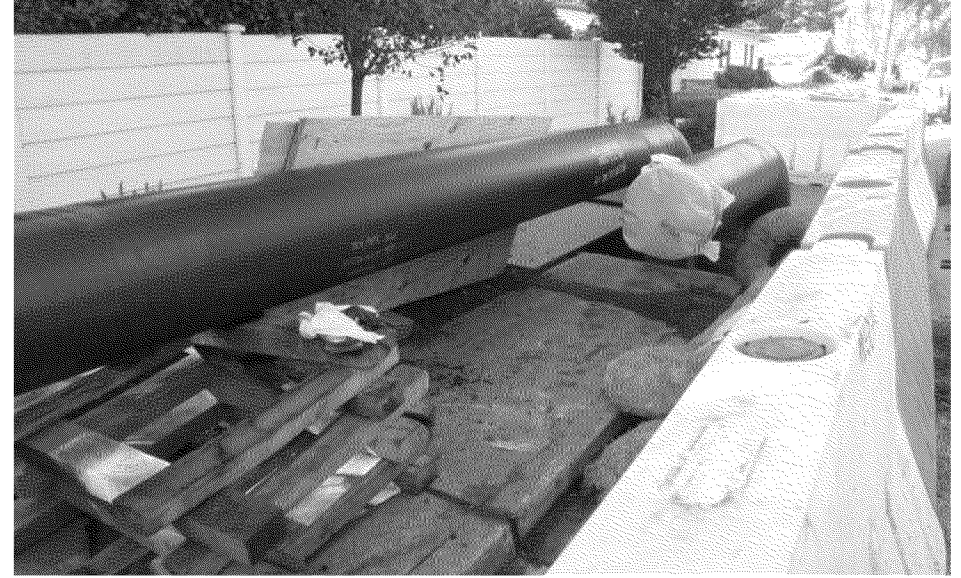
Typical surrounding topography



Typical surrounding topography



Overview of Dig Site T43A-B_L147_B_MP-1.89



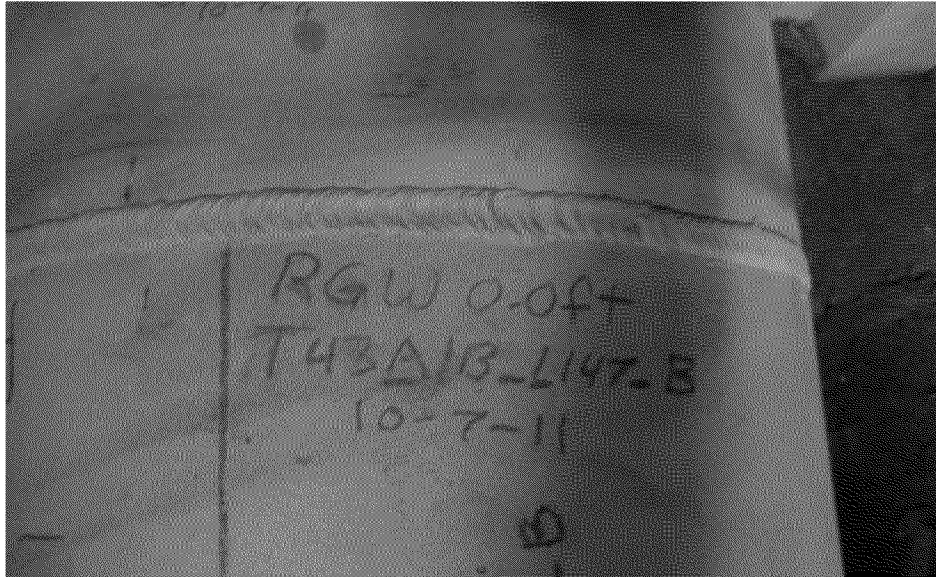
Overview of Dig Site T43A-B_L147_B_MP-1.89



Overview of T43A(US) & T43B(DS) in same excavation.



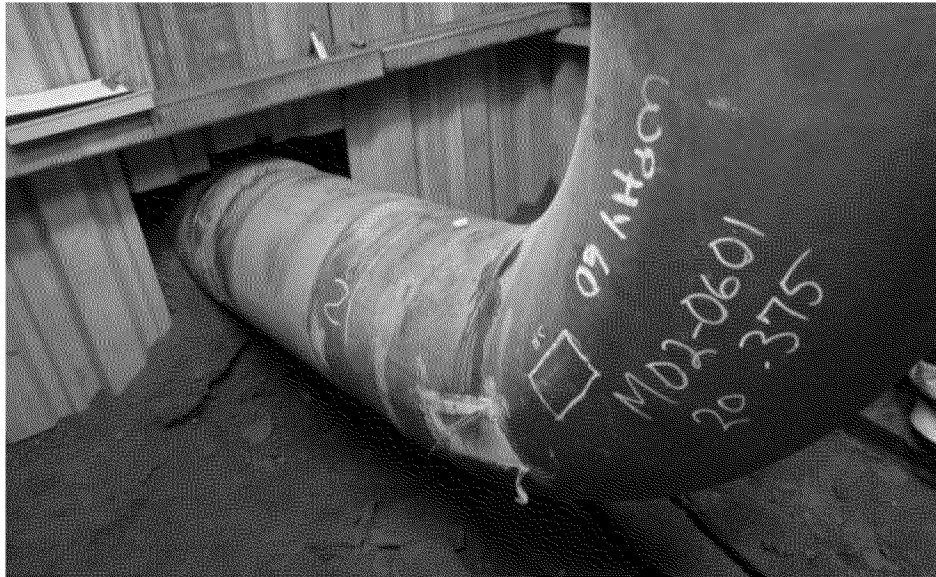
Closeup of T43A(US) & T43B(DS) in same excavation.



Overview of Reference Girth Weld measurements were taken from.



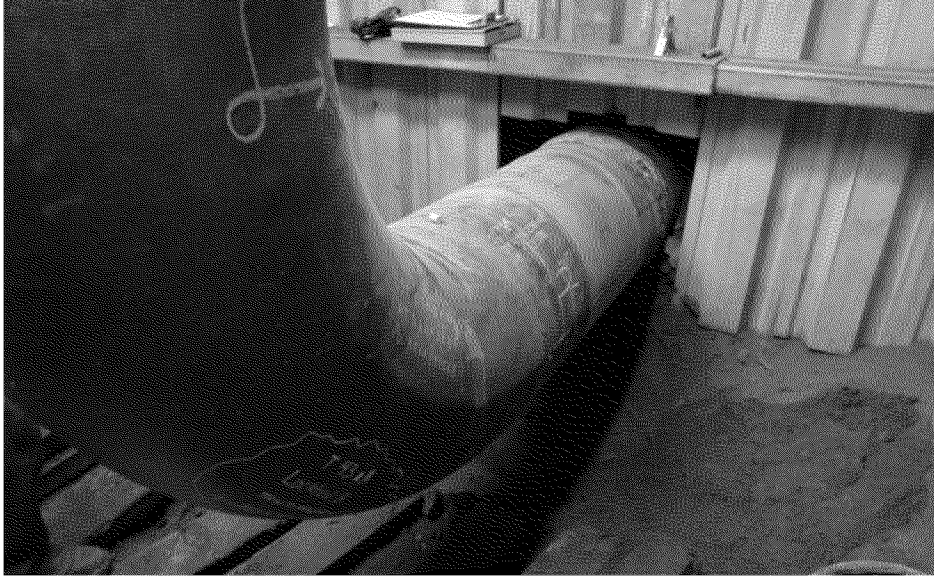
Overview of coating condition -1ft to 2ft, 3:00 position



Overview of coating condition -1ft to 2ft, 3:00 position



Overview of coating condition -1ft to 2ft, 9:00 position



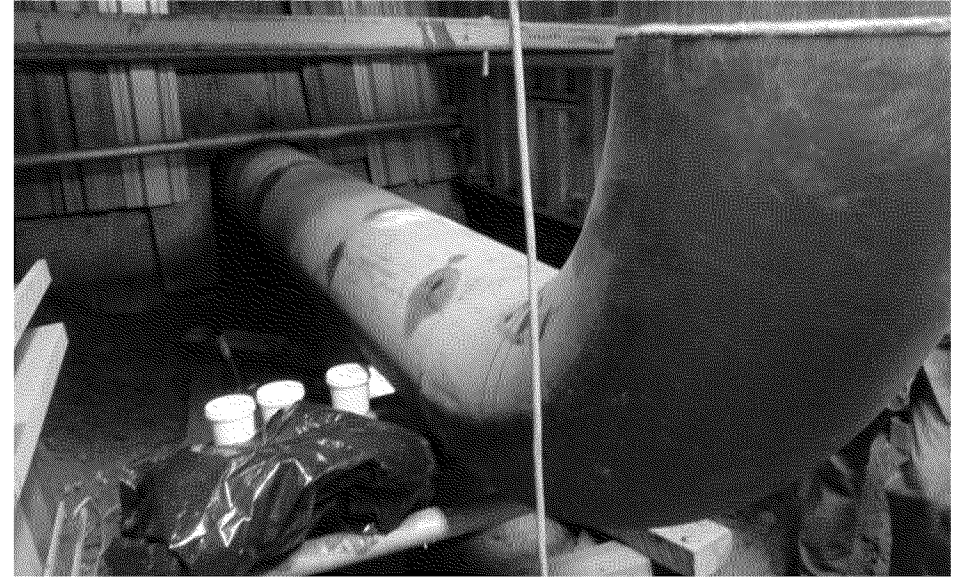
Overview of coating condition -1ft to 2ft, 9:00 position



Overview of coating condition 17ft to 20ft, 3:00 position



Overview of coating condition 17ft to 20ft, 3:00 position



Overview of coating condition 17ft to 20ft, 9:00 position



Overview of coating condition 17ft to 20ft, 9:00 position



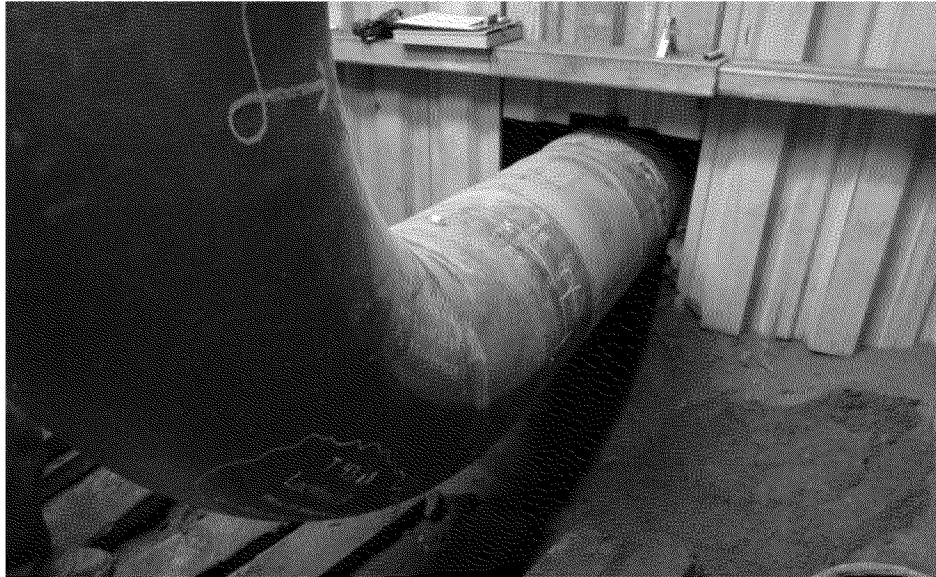
Overview of MPI layout -1ft to 2ft, 3:00 position



Overview of MPI layout -1ft to 2ft, 3:00 position



Overview of MPI layout -1ft to 2ft, 9:00 position



Overview of MPI layout -1ft to 2ft, 9:00 position



Overview of MPI layout 17ft to 20ft, 3:00 position



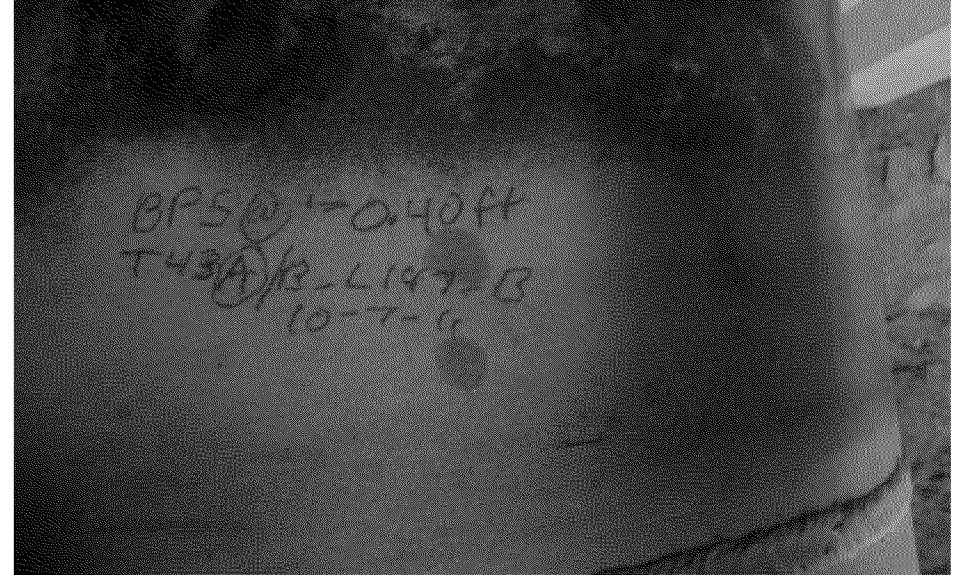
Overview of MPI layout 17ft to 20ft, 3:00 position



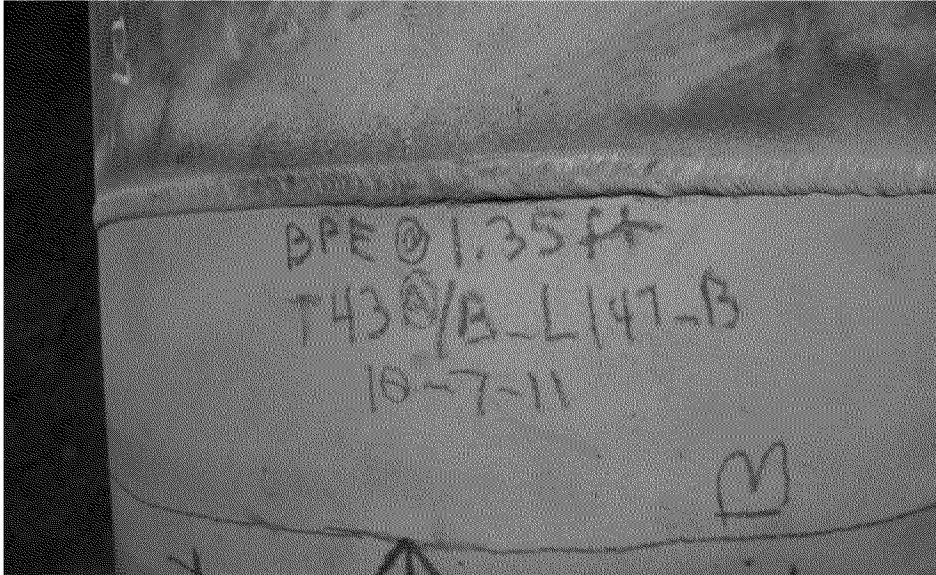
Overview of MPI layout 17ft to 20ft, 9:00 position



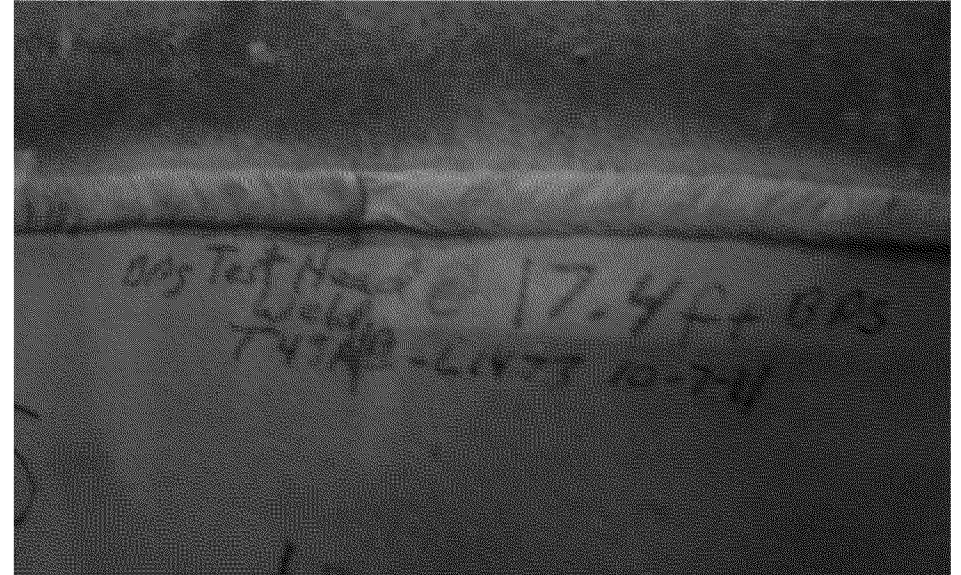
Overview of MPI layout 17ft to 20ft, 9:00 position



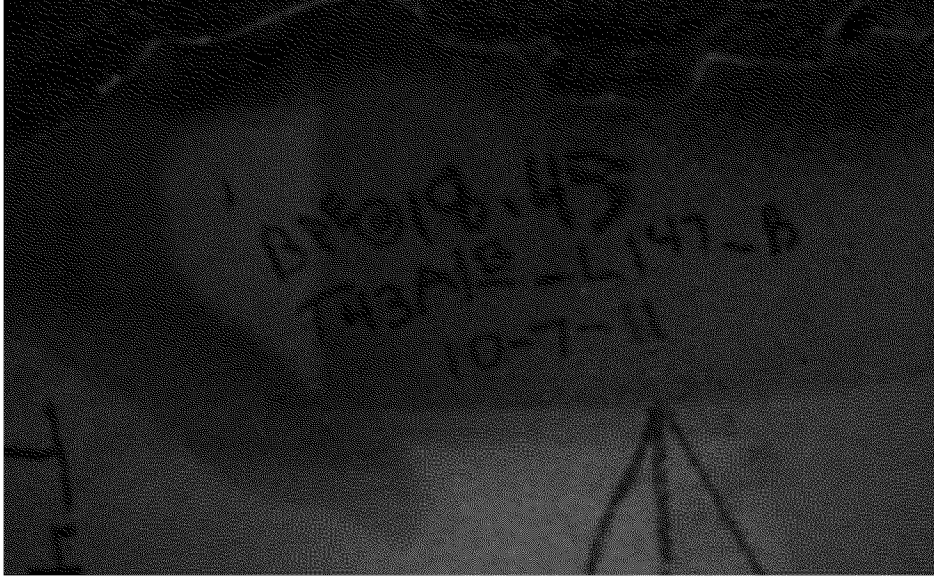
Overview of bare pipe start



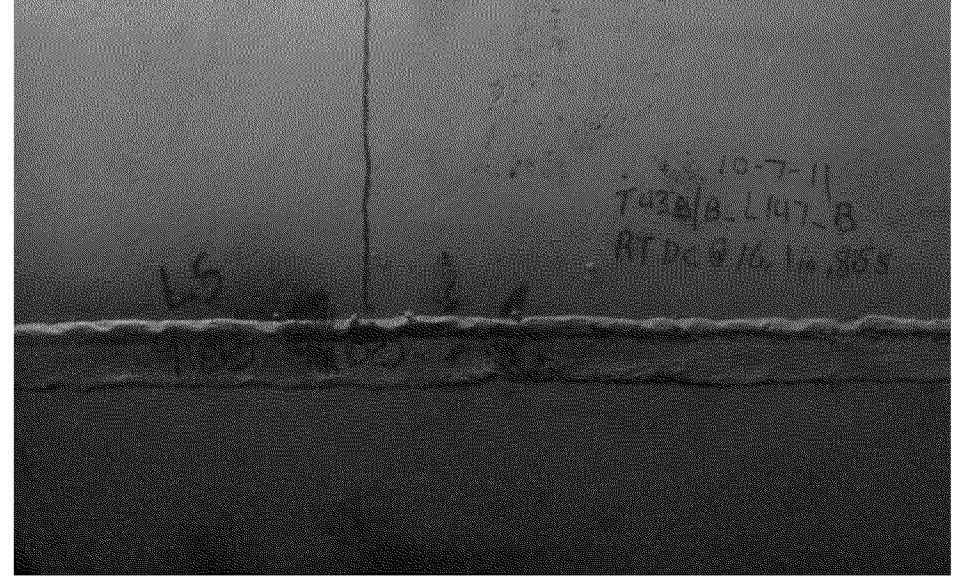
Overview of bare pipe end



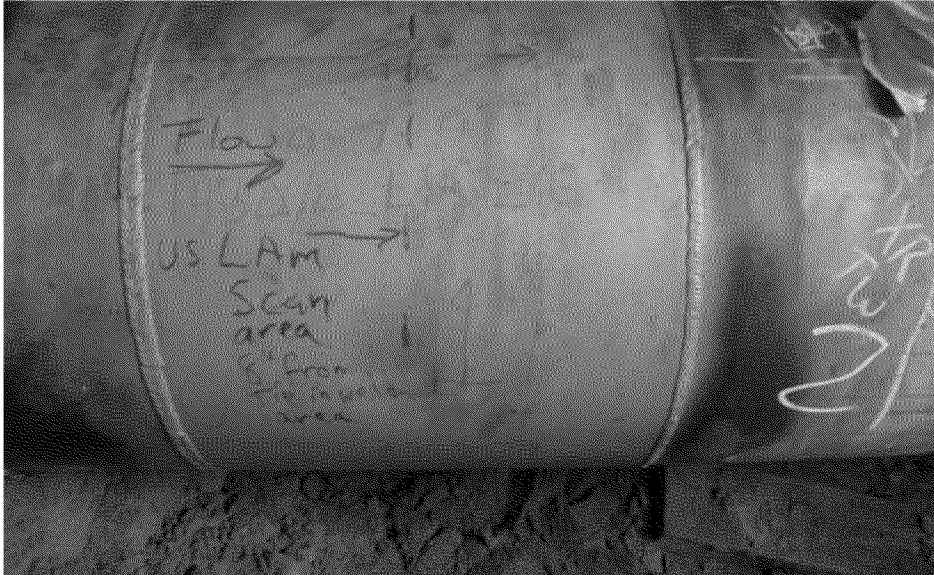
Overview of bare pipe start



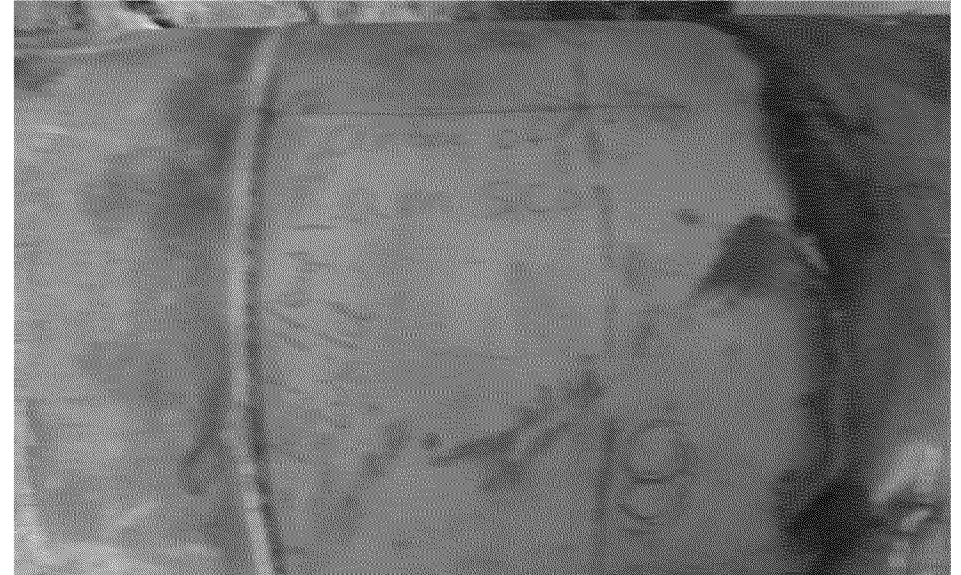
Overview of bare pipe end



Overview of feature joint long seam @ 8:55



Overview of US lamination scan area.



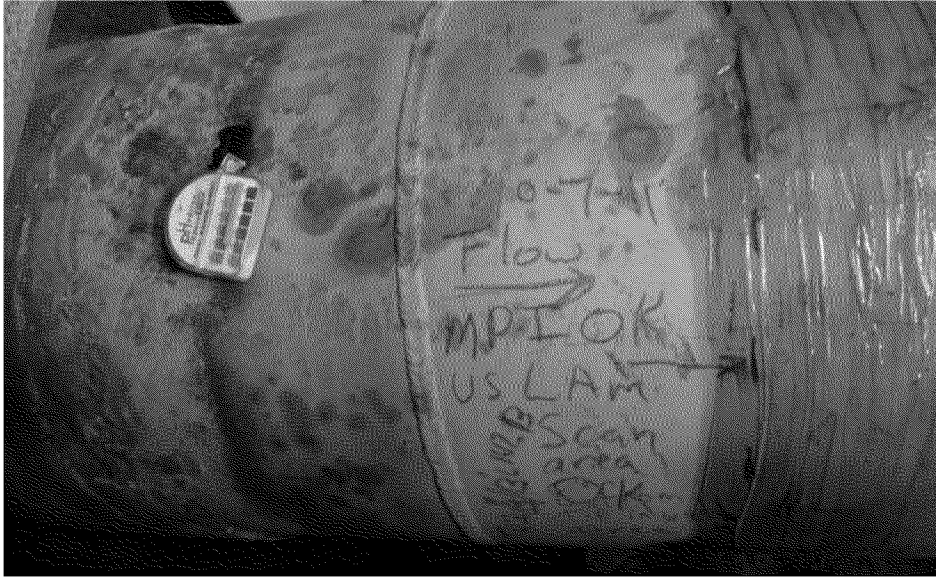
Overview of DS lamination scan area.



Overview of US MPIOK and Lamination scan OK.



Overview DS of MPIOK and Lamination scan OK.



Overview of pipe Ph.



Closeup of pipe Ph.



Removed pipe section coating assesment 3:00



Overview of coating condition 3:00 position



Overview of coating condition 3:00 position



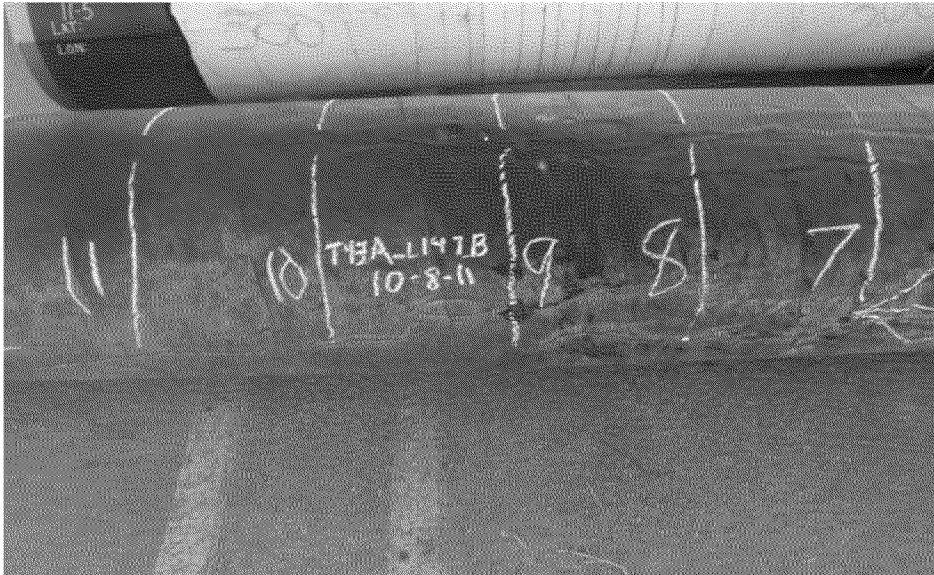
Overview of coating condition 3:00 position



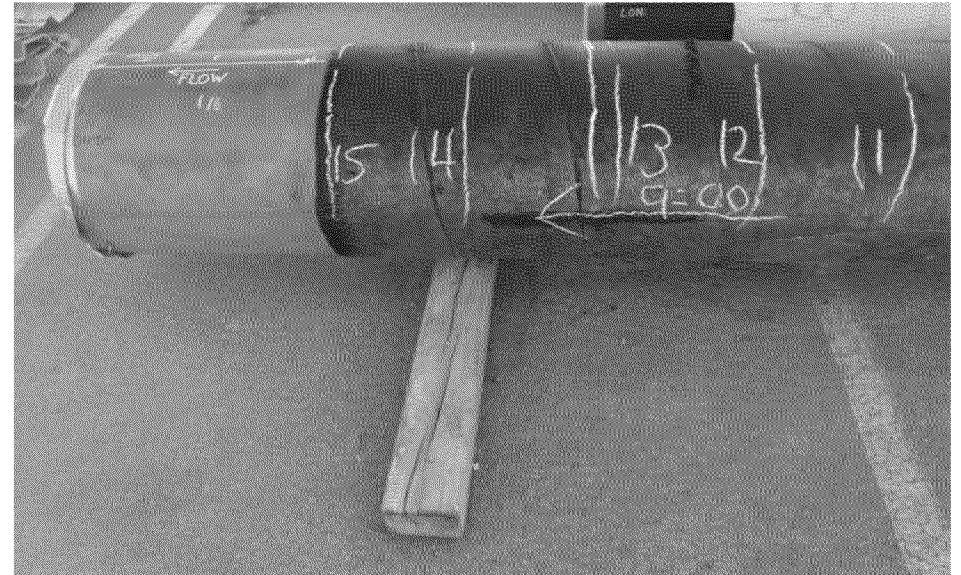
Removed pipe section coating assesment 9:00



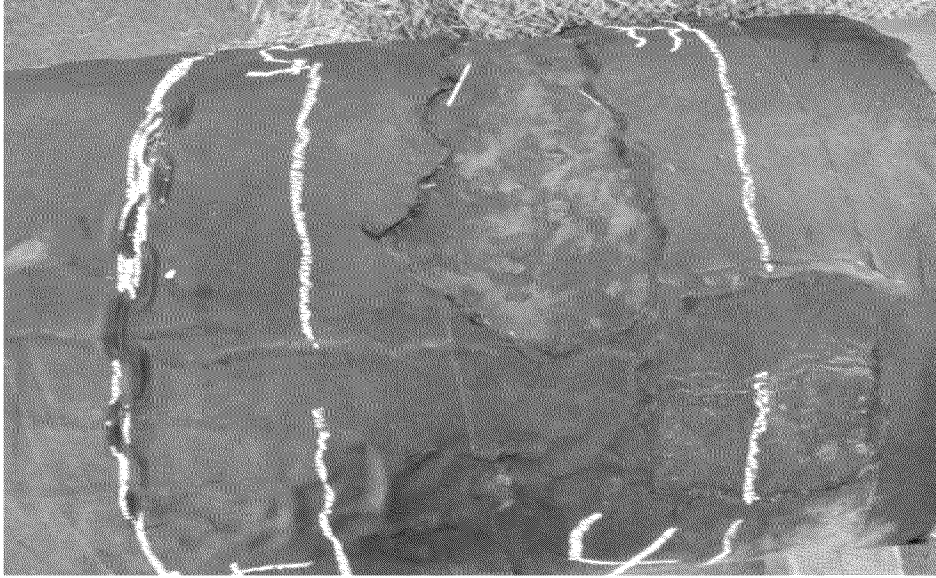
Overview of coating condition 9:00 position



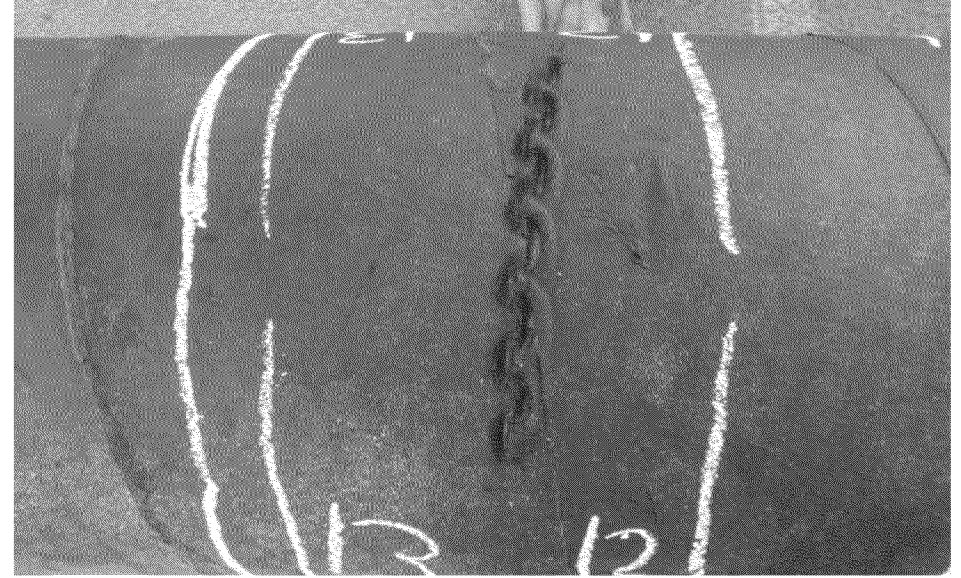
Overview of coating condition 9:00 position



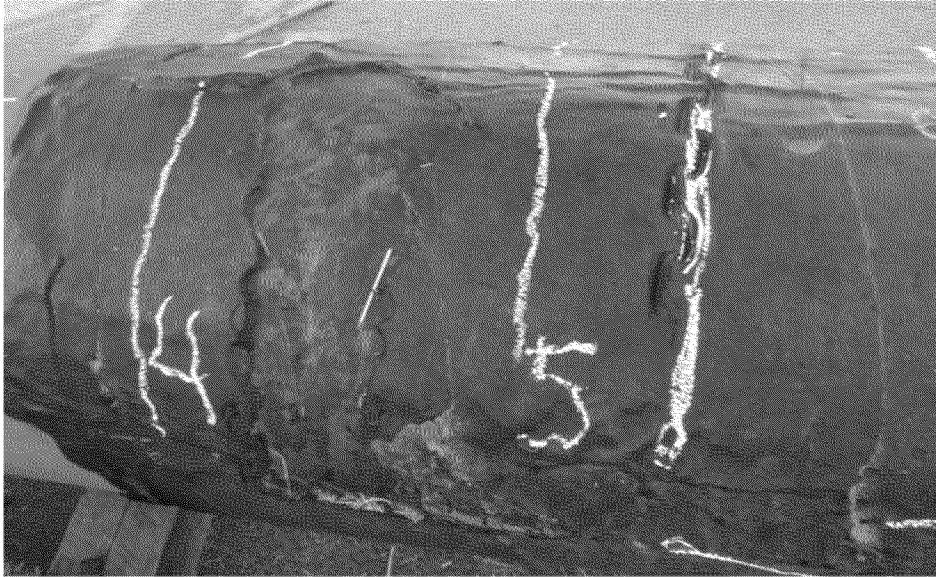
Overview of coating condition 9:00 position



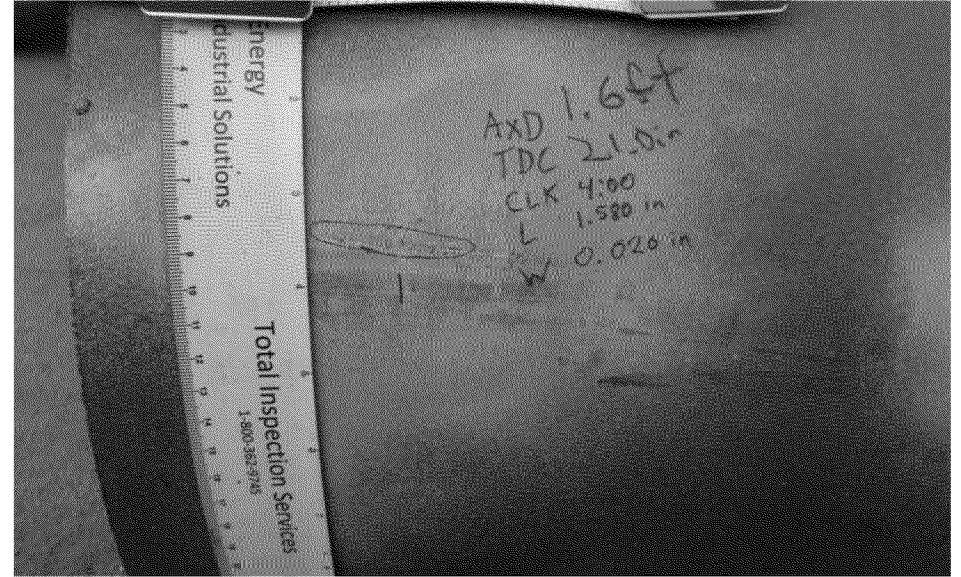
Coating damaged from removal process.



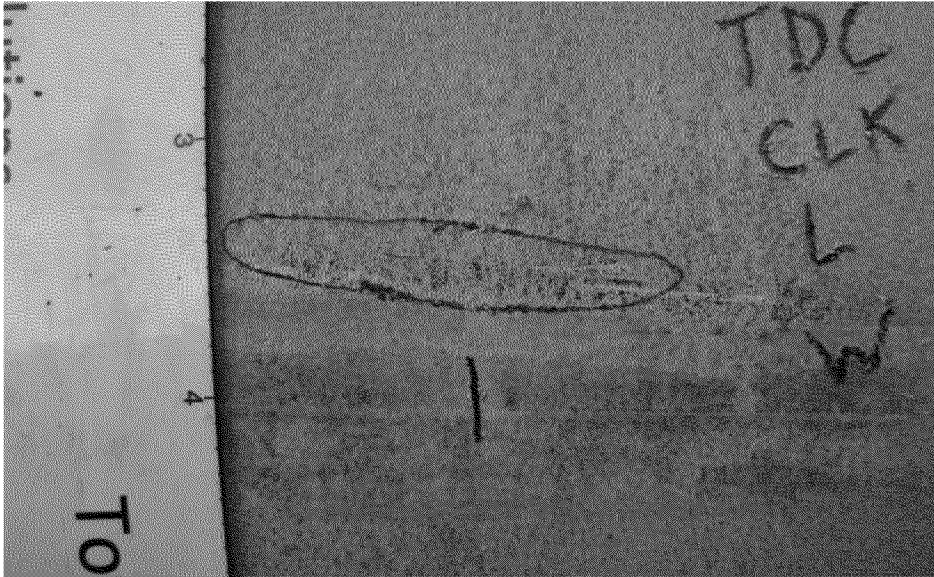
Coating damaged from removal process.



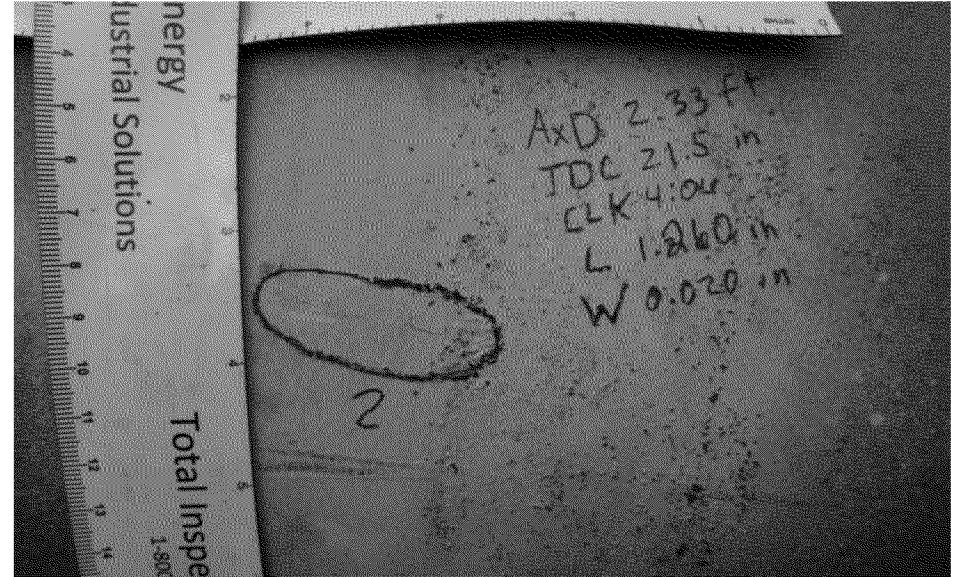
Coating damaged from removal process.



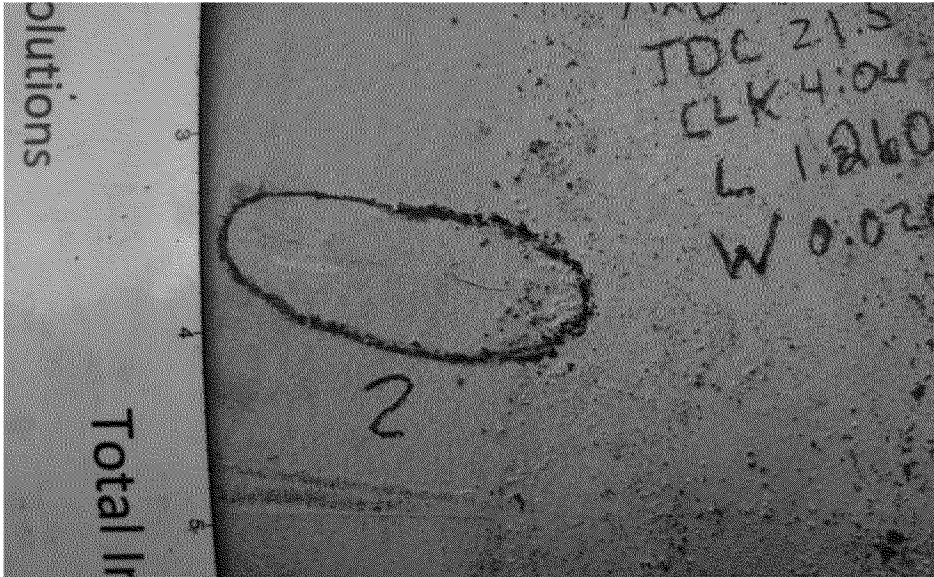
Removed pipe section linear indication-01



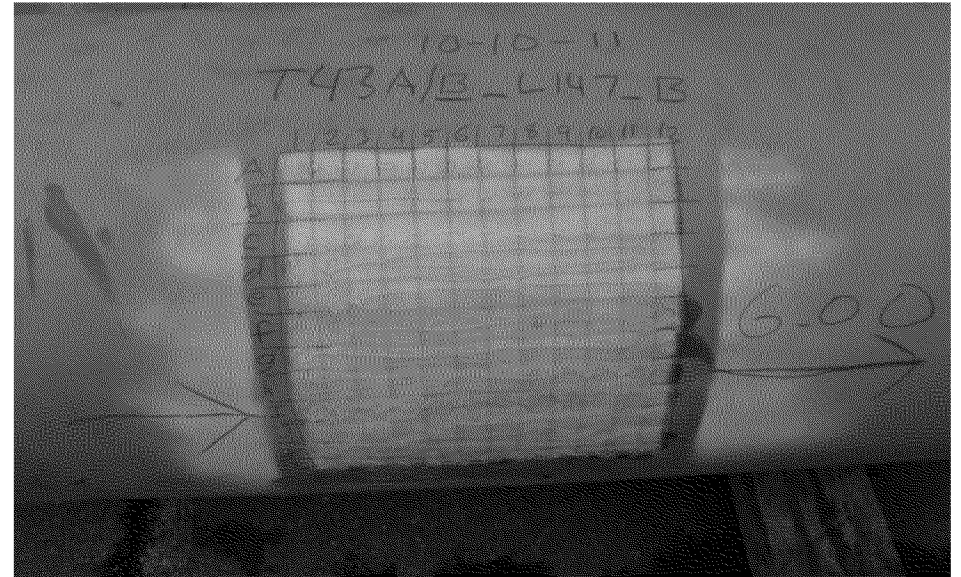
Close up of MT Indications of LIN-01



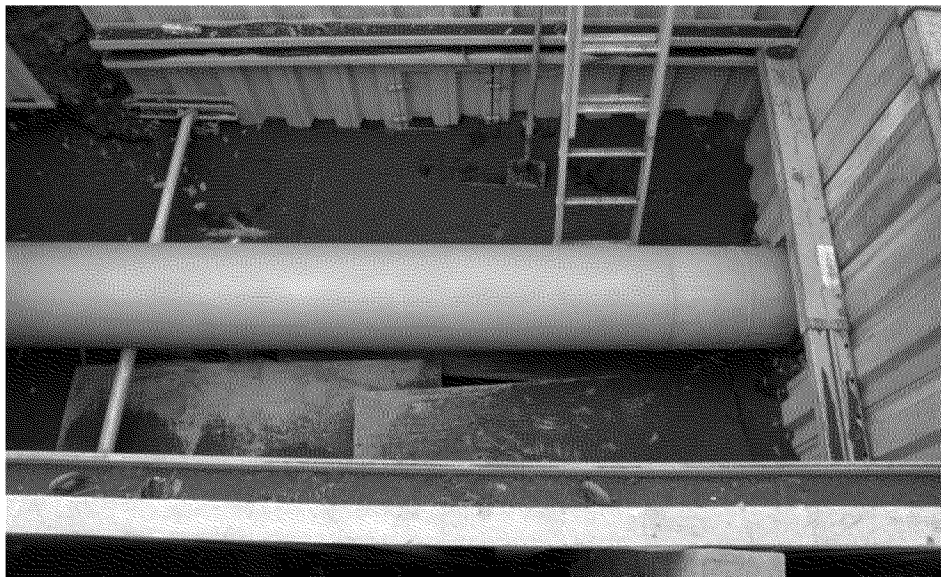
Removed pipe section linear indication-02



Close up of MT Indications of LIN-02



Overview of UT Grid.



Overview of clean blasted inspection area prior to recoat activities



Overview of clean blasted inspection area prior to recoat activities



Overview of clean blasted inspection area prior to recoat activities



Overview of final coating condition US 3:00



Overview of final coating condition 3:00



Overview of final coating condition 3:00



Overview of final coating condition 3:00



Overview of final coating condition US 3:00



Overview of completed Slurry



Overview of completed Slurry

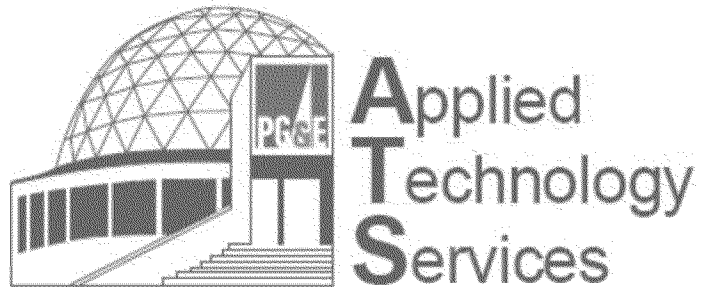


Overview of completed Cover looking upstream



Overview of completed Cover looking downstream

EXHIBIT C



**Line 147
T-43A, Location B
MP. 1.951
Pipe Spool UT Thickness**

Prepared by

**Robert de Haas
Sr. Engineering Technician
Welding & NDE Services**

Prepared for

**Joe Medina
Director
Transmission Process & MAOI
August 29, 2013**

Report No.: 413.61-13.327

***Pacific Gas and Electric Company
Applied Technology Services
3400 Crow Canyon Road, San Ramon, California 94583***



APPLIED TECHNICAL SERVICES

Non Destructive Examination

3400 Crow Canyon Road, San Ramon, CA 94583

Robert de Haas

(925) 866-5849

Cell (209) 480-1063



NONDESTRUCTIVE EXAMINATION DATA

Location and Unit No:	<u>Modesto, Line 147 pipe spool</u>	Examination Date:	<u>08/29/2013</u>	Job	<u>08607-01K</u>
Client Contact:	<u>Joe Medina</u>	Examiner(s):	<u>Robert de Haas</u>		
Manufacturer:	<u>N/A</u>				

INTRODUCTION: At the request of Joe Medina, Director Transmission Process and MAOI, Ultrasonic thickness measurements were taken on a pipe spool, stored in the Modesto pipe storage yard.

COMPONENT EXAMINED: 20" Diameter pipe spool removed from Line 147, (T-43A), MP 1.951.

Pipe spool markings: Line 147
T-43A-11-B, Loc B
Lat. 37.4878247306 / Lon. 122.2701966194

EXAMINATION METHOD: Ultrasonic Thickness Measurements (UTT)
Procedure – ATS-UT-302, Rev 3
Panametrics – EPOCH4, Sn. 21417606
Aerotech Alpha HP - 0.25" diameter, 10 mHz transducer, Sn. G10507
Calibration block – Panametrics 2214E, Sn. 8840
Pipe surface condition – Flash rust

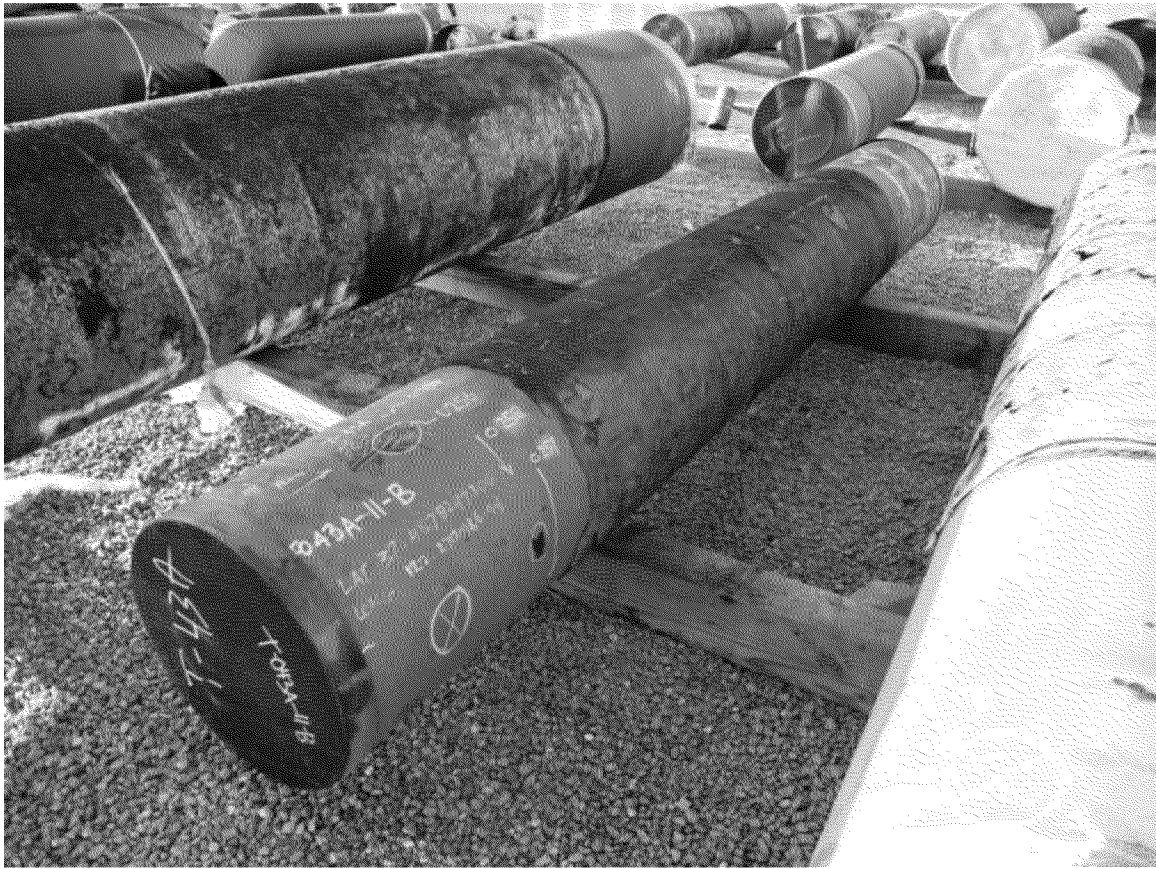
EXAMINATION RESULTS: UT readings showed a pipe wall thickness range of 0.25". Wall thickness readings were taken at four points on the pipe circumference, 90° apart. One additional reading was taken at a polished area where previous pipe grade testing was performed on the upstream end of the spool.

U/S end

<u>Clock position</u>	<u>12:00</u>	<u>03:00</u>	<u>06:00</u>	<u>09:00</u>
	0.256"	0.258"	0.257"	0.247"
Polished area	0.256"			

D/S end

<u>Clock position</u>	<u>12:00</u>	<u>03:00</u>	<u>06:00</u>	<u>09:00</u>
	0.251"	0.253"	0.254"	0.247"



Pipe spool



Upstream end on spool



Downstream end of spool

EXHIBIT D

IN-FIELD SERVICES
GEIS Pipeline Integrity Team NDE

Pacific Gas & Electric Company

Hydrostatic Test Dig from October 7, 2011 to November 5, 2011

T43A/B_L147_B_MP-1.95

Documents Contained Within:

H-Form Report T43A/B_L147_B MP-1.95

NDE Reports of T43A/B_L147_B MP-1.95

Photo Report of T43A/B_L147_B MP-1.95

Authors: H. Mayer & J. Hayes

Date: December 2, 2011



Form H: Direct Examination Data Sheet - Page 1 of 10

<u>DA/ILI</u>	<u>DA</u>	<u>ILI</u>
Route Number: L-147	Site Designation: T43A/B_B	ILI Log Distance: NA
Date of Excavation: 10/7/2011	N-Segment: NA	RMP-11 Ref. Section: Table 5.6.2
Mile Point: 1.95	IMA Number: NA	Reference Girth Weld: NA
Examination Performed By: H. Meyer/J. Hayes	Region Number: NA	Distance From Girth Weld: NA
PG&E Project Manager: Donovan Fink	Subregion # (ICDA): NA	
Approved By: Kenji Gailey	Stationing: NA	
Order Number: 41497360		

Excavation Priority:	Excavation Reason:
<input type="checkbox"/> Immediate <input type="checkbox"/> Scheduled (For ILI - <input type="checkbox"/> 1 Year <input type="checkbox"/> Other)	<input type="checkbox"/> ECDA <input type="checkbox"/> ILI <input type="checkbox"/> Recoat
<input type="checkbox"/> Monitor <input type="checkbox"/> Effectiveness <input checked="" type="checkbox"/> Hydro Test	<input type="checkbox"/> ICDA <input type="checkbox"/> Other <u>NA</u>

If practical, take P/S or CIS reads before excavation: NA

Excavation Details:

U/S Ditch Start GPS Coordinates (Uncorrected Field Measurement)	PDOP: NA	Planned Excavation Length (Ft.): NA
Northing: 37.4878247306	Acc-: NA	Actual Excavation Length (Ft.): 21.0ft
Easting: -122.2701986194		
Centerline GPS Coordinates (Uncorrected Field Measurement)	PDOP: NA	GPS File Name: Guida 148T4313
Northing: NA	Acc-: NA	
Easting: NA		
D/S Ditch End GPS Coordinates (Uncorrected Field Measurement)	PDOP: NA	
Northing: 37.4878664944	Acc-: NA	
Easting: -122.2702163300		

1.0 Data Before Coating Removal

1.1 Native Soil Type: Clay Rock Sand Loam Wet Other NA

1.1A Backfill Material Found: Silt Slurry Native Depth of Cover (Ft.): 6.00ft

Comments: NA

1.2 Coating Type: HAA Somatic Plastic Tape Wax Tape FBE Powercrete

Bare/None Coal Tar Other: NA Comments: NA

Coating Thickness (Inches): 0.250in Number of Layers: 2

1.3 Holiday Testing Performed?: Yes No Voltage Used: NA Map Location of Holidays Below:

Device Used: Coil Wet Sponge Comments: NA

1.4 Pipe-to-Soil Potentials in Ditch (mV):

US: 12:00	-526	3:00	-530	6:00	-535	9:00	-526
DS: 12:00	-661	3:00	-658	6:00	-640	9:00	-663

Comments: CP appears to be very low, may be turned off at time of inspection.

1.5 Soil Resistivity in Ditch (Ω-cm):

Method: 4-Pin 24489.5 ohm/cm Soil Box NA

Comments: NA SRM-100 US: N/A DS: N/A

1.6 Soil Sample Location: Comments: Ditch end (DS) 6:00 position under pipe.

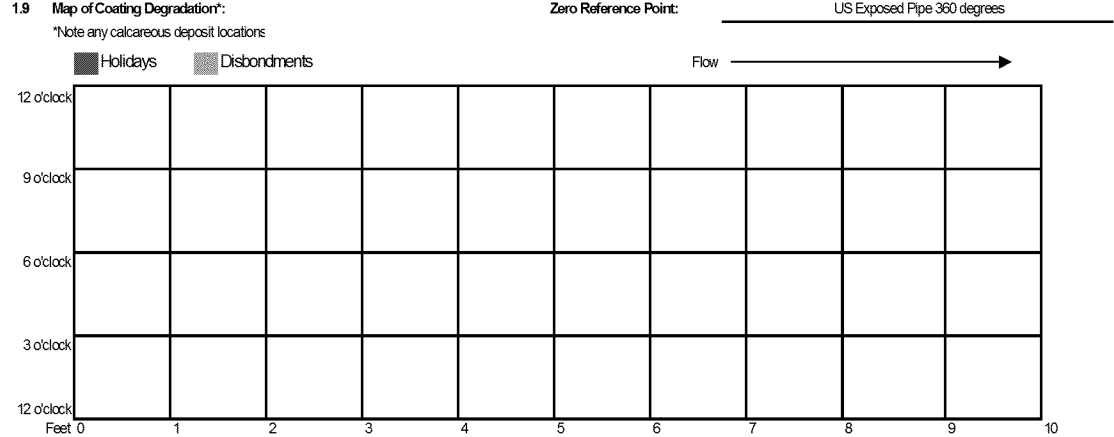
1.7 Ground Water Present?: Yes No Sample(s) Collected?: Yes No Sample pH: NA

Comments: NA

1.8 Coating Condition: Good - Adhered to Pipe Fair - Coating Partially Disbonded or Degraded

Poor - Coating Significantly Disbonded or Missing

Comments: Coating removed & tie in weld areas blasted. Pipe section removed and test pipes installed. Removed pipe section was also assessed and was in good condition except for coating damage from removal and transportation. See comments page 10.



CaCO3	- Calcareous deposits containing calcium
FeO	- General iron oxide with scale
3 FeCO3	- Calcareous deposits containing iron

Form H: Direct Examination Data Sheet - Page 2 of 10

DA/ILI
 Route Number: L-147
 Date of Excavation: 10/7/2011
 Mile Point: 1.95
 Examination Performed By: H. Mayer/J. Hayes
 PG&E Project Manager: Donovan Fink
 Approved By: Kenji Cailey
 Order Number: 41497360

DA
 Site Designation: T43A/B_B
 N-Segment: NA
 IMA Number: NA
 Region Number: NA
 Subregion # (ICDA): NA
 Stationing: NA

ILI
 ILI Log Distance: NA
 RMP-11 Ref. Section: Table 5.6.2
 Reference Girth Weld: NA
 Distance From Girth Weld: NA

1.10 Photos Taken?*: Yes No
 *See Photo Log for additional information.

1.11 Coating Sample Taken?: Yes No Location of Sample: NA

1.12 Liquid Underneath Coating?: Yes No If Yes, pH of Liquid: NA

1.13 Corrosion Product Present?: Yes No If Yes, Was Sample Taken?: Yes No
 Comments: NA

1.14 Soil pH (Sb Electrode): Upstream: 6.0 Downstream: 7.5 Pipe pH: 6.0

2.0 Data After Coating Removal

2.1 Pipe Temperature (°F): 60.0° F Measured Pipe Diameter (In.): 63" = 20.05"

2.2 Weld Seam Type: DSAW SSAW ERW SMLS
 Spiral Lap Flash AO Smith IF CAN'T DETERMINE, VISUALLY PERFORM MACROETCH & LOCATE

2.3 Girth Weld Coordinates & Identify Type (See Table 5.7.3):
 Northing: NA PDOP: NA
 Easting: NA Acc: NA LS Weld Clock Position(s): 8:55
 Elevation: NA

2.4 Damage Found:
 Corrosion Damage Yes No Mechanical Damage Yes No
 Other Damage: Non relevant tool marks, no corrosion found greater than 20%

2.5 UT Wall Thickness Measurements:

	US / DS		US / DS		US / DS		US / DS
TDC:	0.270"/0.275"	1 O'clock	0.267"/0.272"	2 O'clock	0.267"/0.271"	3 O'clock	0.265"/0.271"
4 O'clock	0.268"/0.270"	5 O'clock	0.266"/0.271"	6 O'clock	0.268"/0.273"	7 O'clock	0.266"/0.272"
8 O'clock	0.269"/0.269"	9 O'clock	0.261"/0.263"	10 O'clock	0.266"/0.264"	11 O'clock	0.269"/0.270"

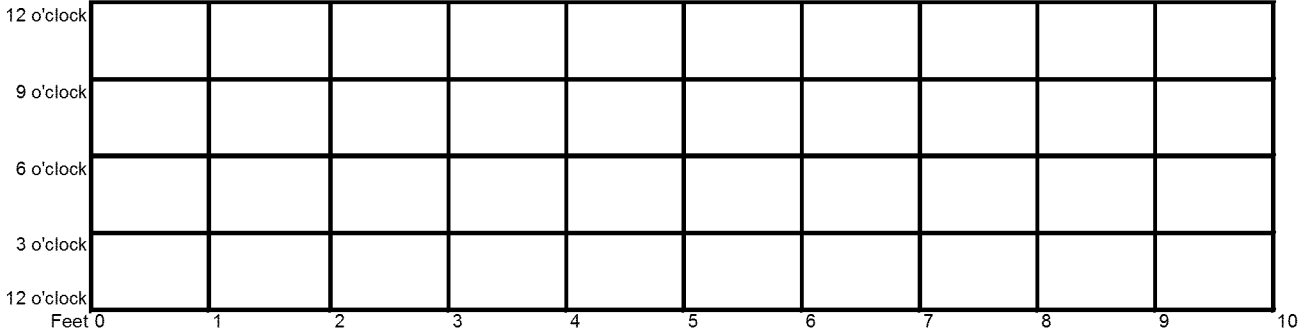
UT Wall Thickness Grid @ 6:00 is required. Be sure to attach grid to H-Form electronically. See page 6 of 10.

2.6 Wet Fluorescent Mag. Part. Is Required. Comments: 2 linear indications on the removed pipe section. See MT & Photo report.
 Were there any linear indications? Yes No If Yes, attach NDE report electronically as part of the H-Form.
 Report to include black light and white light photos of indications.

2.7 Take Photos to Document Corrosion and Other Anomalies*
 *See Photo Log for additional information.

2.8 Overview Map of Corroded Area*:
 *See Pit Depth Measurement Grid for additional Information Zero Reference Point: US Exposed Pipe 360 degrees

*Note any calcareous deposits.



Form H: Direct Examination Data Sheet - Page 3 of 10

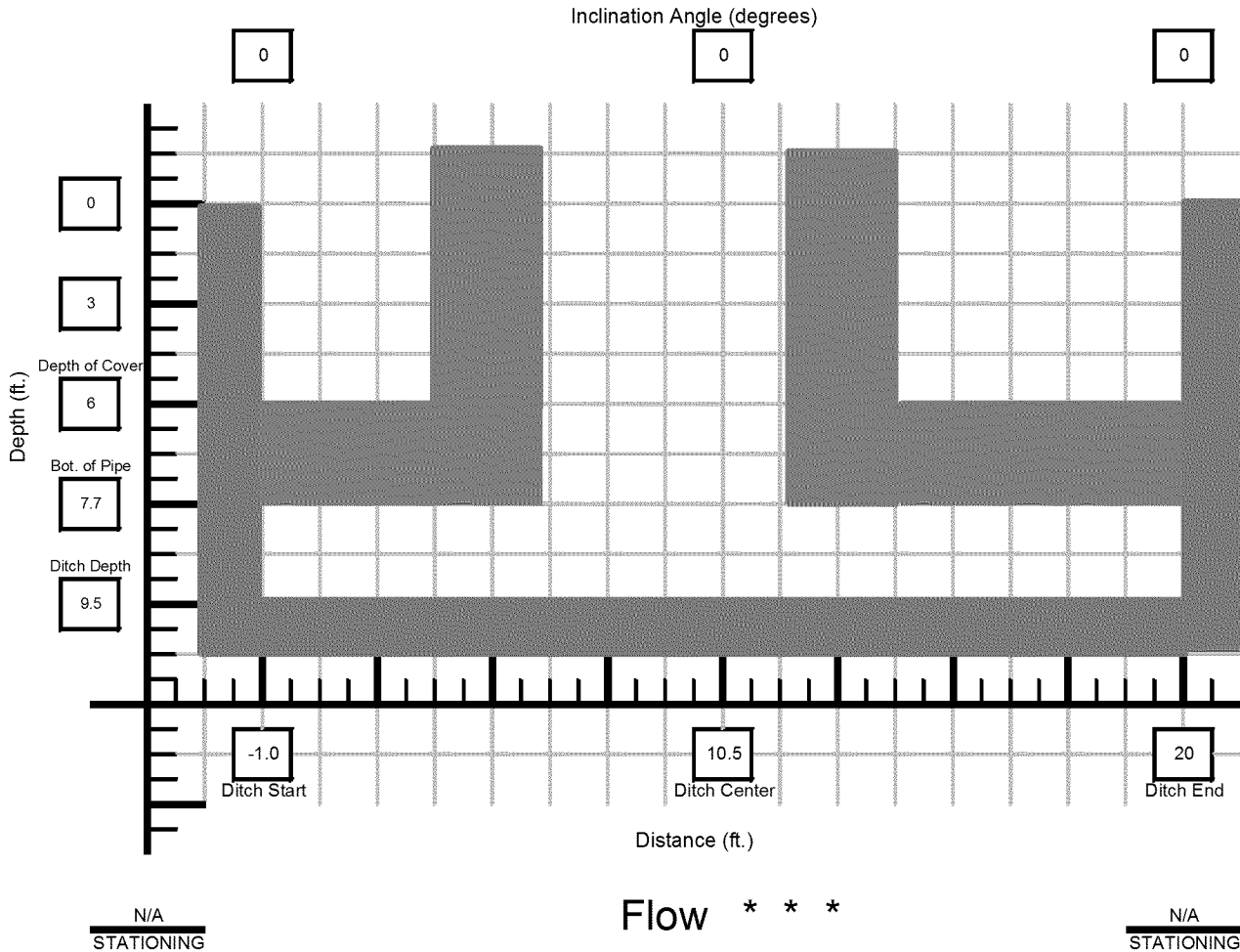
	<u>DA/ILI</u>
Route Number:	L-147
Date of Excavation:	10/7/2011
Mile Point:	1.95
Examination Performed By:	H. Mayer/J. Hayes
PG&E Project Manager:	Donovan Fink
Approved By:	Kenji Gallej
Order Number:	41497360

	<u>DA</u>
Site Designation	T43A/B_B
N-Segment:	NA
IMA Number:	NA
Region Number:	NA
Subregion # (ICDA):	NA
Stationing:	NA

	<u>ILI</u>
ILI Log Distance:	NA
RMP-11 Ref. Section:	Table 5.6.2
Reference Girth Weld:	NA
Distance From Girth Weld:	NA

Excavation Drawing:

At minimum draw pipe elevation profile and indicate stationing of 1) low point and 2) critical inclination angle. Place an arrow on the drawing indicating direction of gas flow in the region(s). Other labels may also be added (e.g. "to Station").



NOTES: (Record stationing and names of nearby landmarks such as creeks and roads. Provide any additional information that may help in spatially positioning pipe):

**See attached Delorme screen shot on page 11.

EXTERNAL PIT DEPTH MEASUREMENT GRID SHEETS

DA/ILI
 Route Number: L-147
 Date of Excavation: 10/7/2011
 Mile Point: 1.95
 Examination Performed By: H. Mayer/J. Hayes
 PG&E Project Manager: Donovan Fink
 Approved By: Kenji Gailey
 Order Number: 41497360

DA
 Site Designation: T43A/B_B
 N-Segment: NA
 IMA Number: NA
 Region Number: NA
 Subregion # (ICDA): NA
 Stationing: NA

ILI
 ILI Log Distance: NA
 RMP-11 Ref. Section: Table 5.6.2
 Reference Girth Weld: NA
 Distance From Girth Weld: NA

□	.001 - .009
□	.010 - .099
□	.100 - .199
□	.200 - .299
■	Highest pit reading

Grid Size = _____ Inch x _____ Inch (specify grid size)
 Clock Position (specify below)

Anomaly # NA Grid # NA

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	
A																							
B																							
C																							
D																							
E																							
F																							
G																							
H																							
I																							
J																							
K																							
L																							
M																							
N																							
O																							
P																							
Q																							
R																							
S																							
T																							
U																							
V																							
W																							
X																							

PIT DEPTH GRID 1 OF 2

EXTERNAL PIT DEPTH MEASUREMENT GRID SHEETS

DA/ILI
 Route Number: L-147
 Date of Excavation: 10/7/2011
 Mile Point: 1.95
 Examination Performed By: H. Mayer/J. Hayes
 PG&E Project Manager: Donovan Fink
 Approved By: Kenji Gailey
 Order Number: 41497360

DA
 Site Designation: T43A/B_B
 N-Segment: NA
 IMA Number: NA
 Region Number: NA
 Subregion # (ICDA): NA
 Stationing: NA

ILI
 ILI Log Distance: NA
 RMP-11 Ref. Section: Table 5.6.2
 Reference Girth Weld: NA
 Distance From Girth Weld: NA

	.001 - .009
	.010 - .099
	.100 - .199
	.200 - .299
	Highest pit reading

Grid Size = _____ Inch x _____ Inch (specify grid size)
 Clock Position (specify below)

Anomaly # NA Grid # NA

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	
A																							
B																							
C																							
D																							
E																							
F																							
G																							
H																							
I																							
J																							
K																							
L																							
M																							
N																							
O																							
P																							
Q																							
R																							
S																							
T																							
U																							
V																							
W																							
X																							

NA

Form H: Direct Examination Data Sheet - Page 6 of 10

INTERNAL CORROSION WALL LOSS GRID

DA/ILI	DA	ILI
Route Number: <u>L-147</u>	Site Designation: <u>T43A/B_B</u>	ILI Log Distance: <u>NA</u>
Date of Excavation: <u>10/7/2011</u>	N-Segment: <u>NA</u>	RMP-11 Ref. Section: <u>Table 5.6.2</u>
Mile Point: <u>1.95</u>	IMA Number: <u>NA</u>	Reference Girth Weld: <u>NA</u>
Examination Performed By: <u>H. Mayer/J. Hayes</u>	Region Number: <u>NA</u>	Distance From Girth Weld: <u>NA</u>
PG&E Project Manager: <u>Donovan Fink</u>	Subregion # (ICDA): <u>NA</u>	
Approved By: <u>Kenji Gailey</u>	Stationing: <u>NA</u>	
Order Number: <u>41497360</u>		

Grid Size = 1 Inch x 1 Inch

Clock Position (specify below)

All measurements are in inches.

UT Grid is centered @ 6:00 position on pipe.

	1	2	3	4	5	6	7	8	9	10	11	12
A	0.251"	0.251"	0.249"	0.249"	0.249"	0.249"	0.249"	0.248"	0.248"	0.248"	0.248"	0.248"
B	0.251"	0.254"	0.251"	0.251"	0.249"	0.249"	0.249"	0.249"	0.248"	0.248"	0.248"	0.249"
C	0.253"	0.251"	0.251"	0.251"	0.251"	0.251"	0.251"	0.249"	0.249"	0.248"	0.249"	0.249"
D	0.251"	0.251"	0.251"	0.251"	0.251"	0.249"	0.250"	0.249"	0.249"	0.248"	0.247"	0.249"
E	0.251"	0.251"	0.251"	0.251"	0.251"	0.251"	0.251"	0.251"	0.247"	0.248"	0.247"	0.248"
F	0.251"	0.251"	0.251"	0.251"	0.249"	0.249"	0.251"	0.249"	0.249"	0.247"	0.248"	0.249"
G	0.251"	0.251"	0.247"	0.246"	0.249"	0.248"	0.247"	0.247"	0.246"	0.247"	0.248"	0.247"
H	0.248"	0.249"	0.249"	0.249"	0.248"	0.247"	0.247"	0.247"	0.246"	0.246"	0.246"	0.246"
I	0.249"	0.249"	0.249"	0.249"	0.247"	0.246"	0.244"	0.247"	0.244"	0.244"	0.247"	0.246"
J	0.247"	0.247"	0.247"	0.246"	0.246"	0.246"	0.242"	0.244"	0.244"	0.243"	0.244"	0.246"
K	0.247"	0.247"	0.247"	0.246"	0.246"	0.246"	0.244"	0.244"	0.244"	0.244"	0.244"	0.246"
L	0.249"	0.247"	0.247"	0.247"	0.248"	0.248"	0.248"	0.242"	0.244"	0.244"	0.246"	0.244"

INTERNAL CORROSION GRID

1 of 1

Form H: Direct Examination Data Sheet - Page 10 of 10

DA/ILI
 Route Number: L-147
 Date of Excavation: 10/7/2011
 Mile Point: 1.95
 Examination Performed By: H. Mayer/J. Hayes
 PG&E Project Manager: Donovan Fink
 Approved By: Kenji Gailey
 Order Number: 41497360

DA
 Site Designation: T43A/B_B
 N-Segment: NA
 MA Number: NA
 Region Number: NA
 Subregion # (ICDA): NA
 Stationing: NA

ILI
 ILI Log Distance: NA
 RMP-11 Ref. Section: Table 5.6.2
 Reference Girth Weld: NA
 Distance From Girth Weld: NA

3.0 RECOAT DATA

3.1 Sandblast Media: Sharp Shot 30/60 Anchor Profile Measurement: Average: 3.2 mils

3.2 Pipe Recoated With:
 Powercrete J Poly Tape Bar-Rust 235 Dev Grip 238 Dev Tar 247 Protal 7200 PE Tape

3.3 For Epoxy Coating Systems, Record Environmental Condition:

Air Temperature: 62.4°F Dew Point: 45.1°F
 Pipe Temperature: 67.0°F Relative Humidity: 51.4%
 Time of Day: 12:30 pm

3.4 Repair Coating Hardness (If ARC Coating):
 US 3:00 - 82 6:00 - 79 9:00 - 79 12:00 - 79
 DS 3:00 - 79 6:00 - 75 9:00 - 79 12:00 - 81

3.5 Measured Coating Thickness:
 US 3:00 - 33.7 6:00 - 38.7 9:00 - 57.5 12:00 - 27.4
 DS 3:00 - 37.3 6:00 - 28.6 9:00 - 39.0 12:00 - 29.3

Holiday Tested?: Yes No
 Device Used: Coil Wet Sponge Voltage Used: UNK Repair All Holidays. YES

3.6 Coupon Test Station Installed?: Yes No ETS Installed?: Yes No

If Yes, Date Installed: NA

Surface Configuration: Fink G-5 Box Carsonite Other: NA

3.7 Backfill Material: Native Imported Sand Other: NA

Coating Protections?: Yes No

If Yes, Check One: Rockguard Tuf-E-Nuf Conwed Other: STACguard (transitions only)

3.8 Pipe-to-Soil Readings Over Bell Hole After Backfill: NA

*If specified, a CIS should be done for approximately 100' on either side of the bell hole. Attach data.

Comments: NA

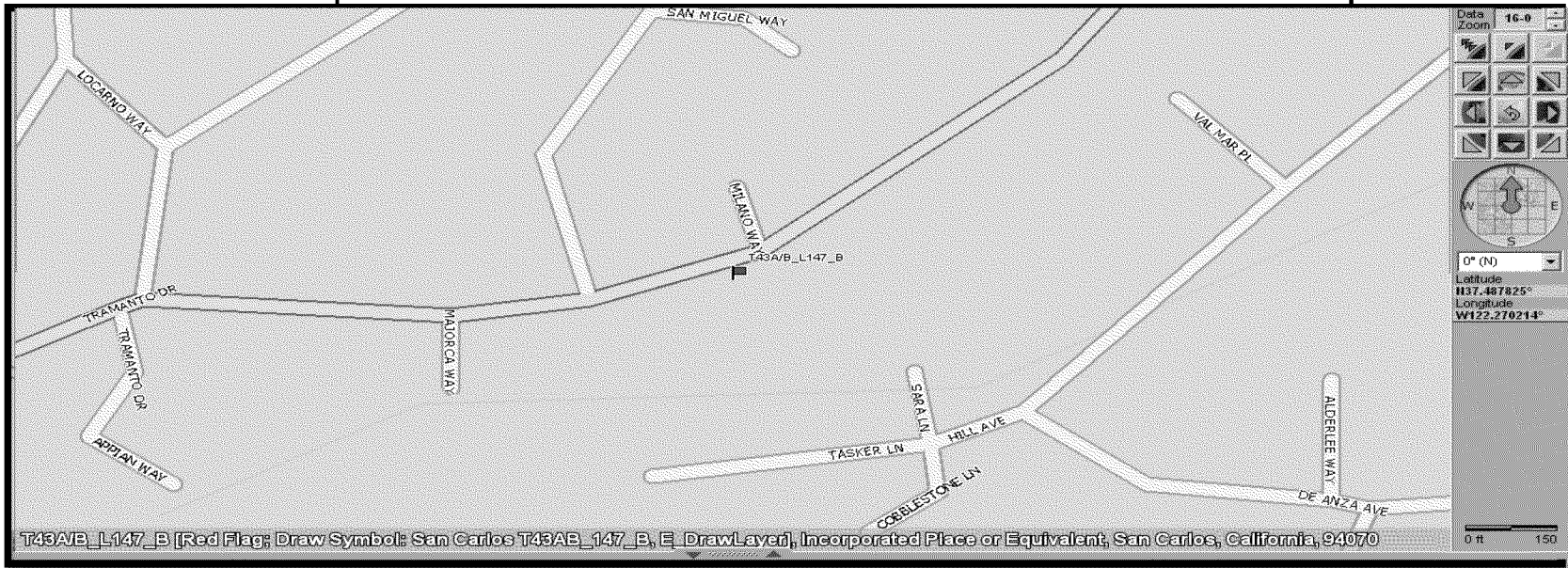
3.9 Attach site sketch of excavation site.

4.0 REPAIR DATA

4.1 Repair Made: Yes No 4.2 Number of Repair Made: Replacement "In-Kind configuration"
 4.3 Repair Type: Metallic Sleeve Non Metallic Sleeve Replace Can Filler Metal Other
 4.4 Damage Repaired: Corrosion Mechanical Other

Misc. Comments/Information: T43A had coating removed, area for inspection was blasted from coating up to test pipe tie in weld. About 1 ft of coating was inspected. T43B had coating removed, area for inspection was blasted from coating up to test pipe tie in weld. About 1.5 ft of coating was inspected. Removed pipe section was inspected at the PG&E yard.

T43A/B_L147_B_MP-1.95



GE Energy
INSPECTION & LIFE EXTENSION SERVICES

MAGNETIC PARTICLE EXAMINATION REPORT							<input type="checkbox"/> Nuclear	<input checked="" type="checkbox"/> Non-Nuclear	
To: Pacific Gas & Electric Company				From: H. Mayer/J. Hayes		Date: 10/7/2011			
Project: T43A/B_L147_B_MP-1.95									
Purchase Order No: 41497360				GEIS Job No: LAPI0015					
Item	Weld	Structural	Casting	Machinery	Mach. Parts	Pipe	N/A	Other: N/A	
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Material	Non-Weld	Plate	Pipe	Bar	Casting	Mach. Parts	N/A	Other: N/A	
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Material	Size 20"	Material Thickness 0.250"	Type of Base Material Carbon Steel		Type of Filler Material C/S		Weld	<input checked="" type="checkbox"/> N/A <input type="checkbox"/> Smooth <input type="checkbox"/> As Welded	
Location	70.6 Ft SW of the intersection of Brittan Ave and Milano Way in San Carlos, CA 94070				System L-147				
Acceptance Standards	Customer Specifications				Procedure GEIS QCP # 500 Rev 17				
Type of Check	Initial	Plate Edge	In Process	Back Gouge	Root Pass	Repair	12 Hour	24 Hour	Final
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Type of Inspection	<input type="checkbox"/> Longitudinal	<input type="checkbox"/> Coil	<input type="checkbox"/> DC Probe		<input checked="" type="checkbox"/> Continuous		Other:		
	<input checked="" type="checkbox"/> Wet	<input type="checkbox"/> Dry	<input type="checkbox"/> Direct Contact		<input checked="" type="checkbox"/> Residual				
	<input type="checkbox"/> Circular	<input type="checkbox"/> ACProd	<input checked="" type="checkbox"/> Yoke		<input type="checkbox"/> Other				
MT Yoke & Model - Serial No. / Blacklight Model - Serial No. Parker DA-400 - S# 18830 / Spectroline BIP - S# 1597251					Surface Preparation Method Abrasive Blasting (Kleen Blast) - NACE 2 Finish				
Inspection Medium / Color / Batch No. Magnaglo 14A / Flourescent Green / 09M12K					Demagnetization Method / Equipment N/A				
Reference: Summary <input checked="" type="checkbox"/> See Attachment						Results of Inspection			
The following areas were requested to be inspected:									
Bare pipe: -0.40' to 1.35' from original U/S ditch start.									
Bare pipe : 17.4' to 18.45' from original U/S ditch start.									
Removed pipe section.									
Summary:									
Lin-01: Axial Start=1.60' (From U/S end of pipe), AL=1.58", CW=0.020", CLK Position= 4:00									
Lin-02: Axial Start=2.33' (From U/S end of pipe), AL=1.20", CW=0.020", CLK Position= 4:06									
These are on the removed pipe section.									
Indications were on the removed pipe section. Please see attached photo report for additional information.									
Copy To: <i>Pacific Gas & Electric Company</i> <i>GE Inspection Services (Los Angeles)</i>				Requested By: David Aguiar			Reported By (Technician): H. Mayer/J. Hayes		
				<input checked="" type="checkbox"/> Customer Specifications			NDT supervisor:		
				<input checked="" type="checkbox"/> Accept <input type="checkbox"/> Reject			Andre J. Filiatraut		

NOTICE: THIS EXAMINATION REPORT IS A REPORT OF THE RESULTS OF THE NDT PROCEDURE ACTUALLY PERFORMED BY THIS COMPANY IT IS SUBJECT TO THE LIMITATIONS OF THE TESTING SPECIFICATIONS AND PROCEDURES WHICH WERE UTILIZED. BY FURNISHING THIS REPORT, **GE INSPECTION & LIFE EXTENSION SERVICES** DOES NOT GUARANTEE ANY CONDITION OF THE TESTED SPECIMEN.



GE Energy
Inspection & Life Extension Services

ULTRASONIC EXAMINATION REPORT						<input type="checkbox"/> Nuclear	<input checked="" type="checkbox"/> Non-Nuclear	
To: Pacific Gas & Electric Company			From: H. Mayer & J. Hayes		Date: 10/7/2011			
Project: T43A/B_L147_B_MP-1.95								
Purchase Order No: 41497360				GEIS Job No: LAPI0015				
Item	Weld <input checked="" type="checkbox"/>	Structural <input type="checkbox"/>	Casting <input type="checkbox"/>	Machinery <input type="checkbox"/>	Mach. Parts <input type="checkbox"/>	Pipe <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	Other:
	Non-Weld <input checked="" type="checkbox"/>	Plate <input type="checkbox"/>	Pipe <input type="checkbox"/>	Bar <input type="checkbox"/>	Casting <input type="checkbox"/>	Mach. Parts <input type="checkbox"/>	N/A <input type="checkbox"/>	Other:
Material	Size: 20"	No. of Pieces: 1	Type of Base Metal: Carbon Steel	Type of Filler Material: C/S	Weld <input checked="" type="checkbox"/> N/A <input type="checkbox"/> Smooth <input type="checkbox"/> As Welded			
Location	70.6 Ft SW of the intersection of Brittan Ave and Milano Way in San Carlos, CA 94070				System: L-147			
Acceptance Standards	Customer Specifications				Procedure: QCP-601			
Type of Inspection	Soundness <input checked="" type="checkbox"/>	Thickness <input checked="" type="checkbox"/>	Bond <input type="checkbox"/>	Transducer: <input checked="" type="checkbox"/> Single Crystal <input type="checkbox"/> Dual Crystal		Transducer Serial No.: 020HFC		
	Pulse Echo <input checked="" type="checkbox"/>	Angle-Beam <input type="checkbox"/>	Other <input type="checkbox"/>	Frequency: 5 MHz	Size: 0.375"	Angle: 0°	Couplant / Batch #: Sonatest Ultragel II / 25-901 07225 AF	
	UT Equipment/Model: USN-60			Flat <input checked="" type="checkbox"/>	Concave <input type="checkbox"/>	Convex <input type="checkbox"/>	Serial No.:	
	Serial #: 01NLKN			Standard	Material	Notch Depth	Serial No.:	
	Calibration Date: 10/5/2011			Step Wedge <input checked="" type="checkbox"/>	Material	Thickness Range: 0.200" - 0.500"	Serial No.: V34693	
Calibration Due: 1/5/2012			Tube Wedge <input type="checkbox"/>	C/S				
Reference: Summary <input checked="" type="checkbox"/> See Attachment						Results of Inspection:		
The following areas were requested to be inspected: 12" x 12" (1"x1" grid) at a random 6:00 position on the pipe. 12" lamination scans at cut-line locations. Thickness readings US & DS inspection areas at the clock positions.						- No relevant indications @ time of inspection.		
						- No relevant indications @ time of inspection.		
						- No relevant indications @ time of inspection.		
** Please see attached reports for additional information.								
Copy To: Pacific Gas & Electric Company GE Inspection Services (Los Angeles)				Requested By: David Aguiar		Reported By (Technician): H. Mayer/J. Hayes		
				<input checked="" type="checkbox"/> Customer Specifications <input checked="" type="checkbox"/> Accept <input type="checkbox"/> Reject		NDT Supervisor: Andre J. Filiatrault		

NOTICE:
 THIS EXAMINATION REPORT IS A REPORT OF THE RESULTS OF THE NDT PROCEDURE ACTUALLY PERFORMED BY THIS COMPANY IT IS SUBJECT TO THE LIMITATIONS OF THE TESTING SPECIFICATIONS AND PROCEDURES WHICH WERE UTILIZED. BY FURNISHING THIS REPORT, GE INSPECTION SERVICES DOES NOT GUARANTEE ANY CONDITION OF THE TESTED SPECIMEN.



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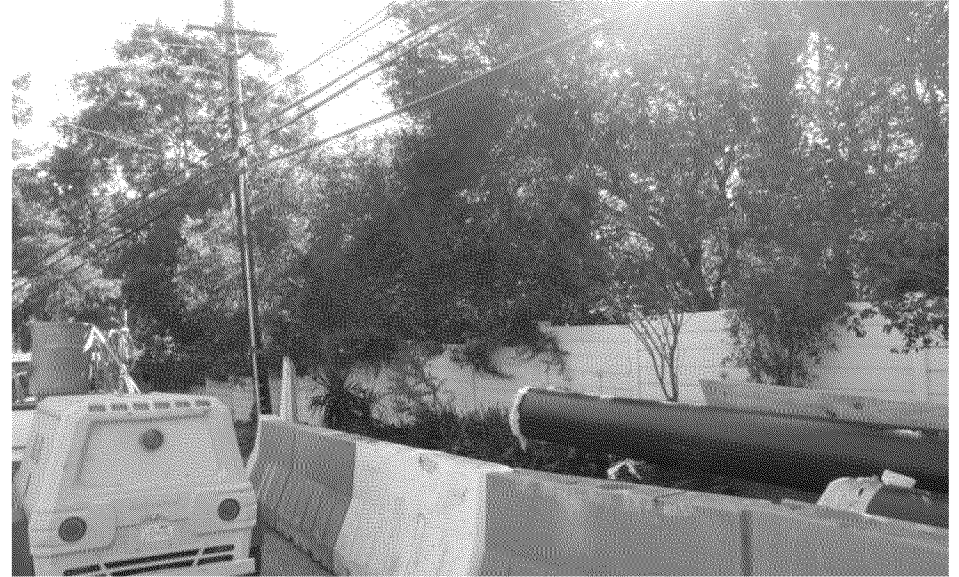
Topography looking upstream



Topography looking downstream

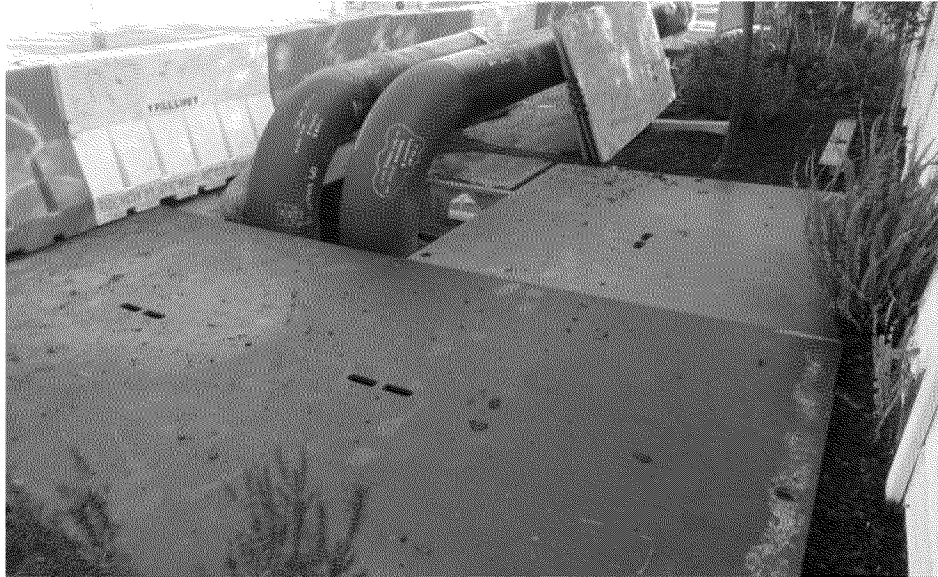


Typical surrounding topography

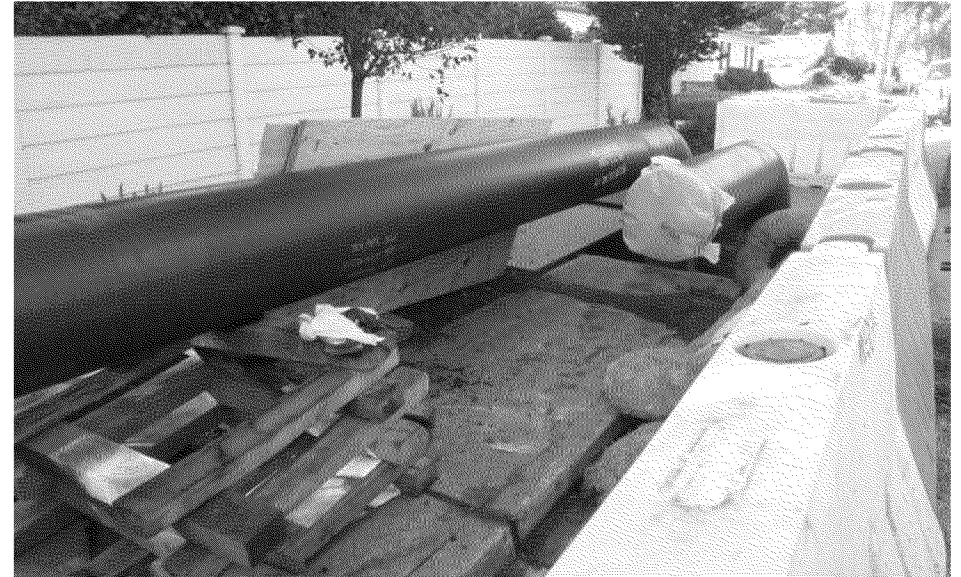


Typical surrounding topography

g



Overview of Dig Site T43A-B_L147_B_MP-1.89



Overview of Dig Site T43A-B_L147_B_MP-1.89

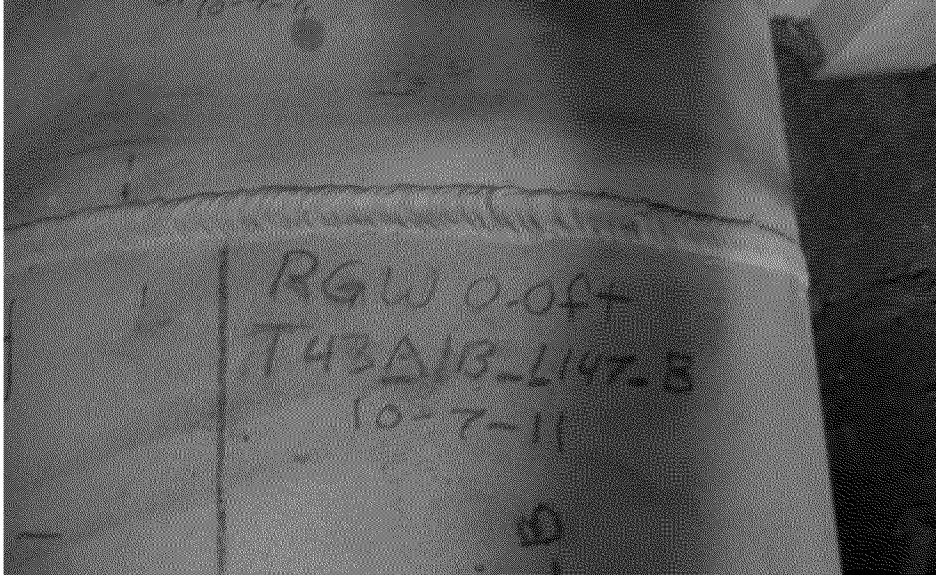


Overview of T43A(US) & T43B(DS) in same excavation.



Closeup of T43A(US) & T43B(DS) in same excavation.

g



Overview of Reference Girth Weld measurements were taken from.



Overview of coating condition -1ft to 2ft, 3:00 position

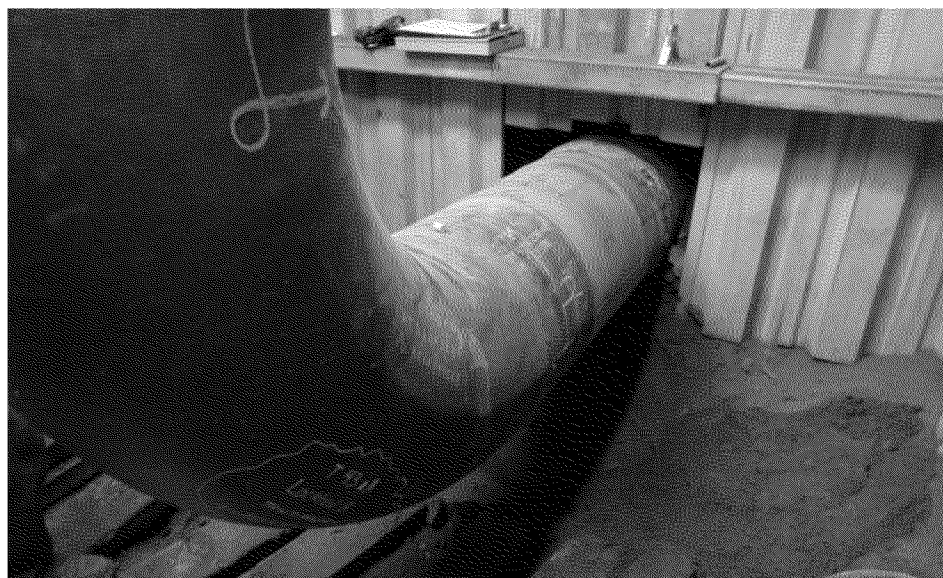


Overview of coating condition -1ft to 2ft, 3:00 position



Overview of coating condition -1ft to 2ft, 9:00 position

g



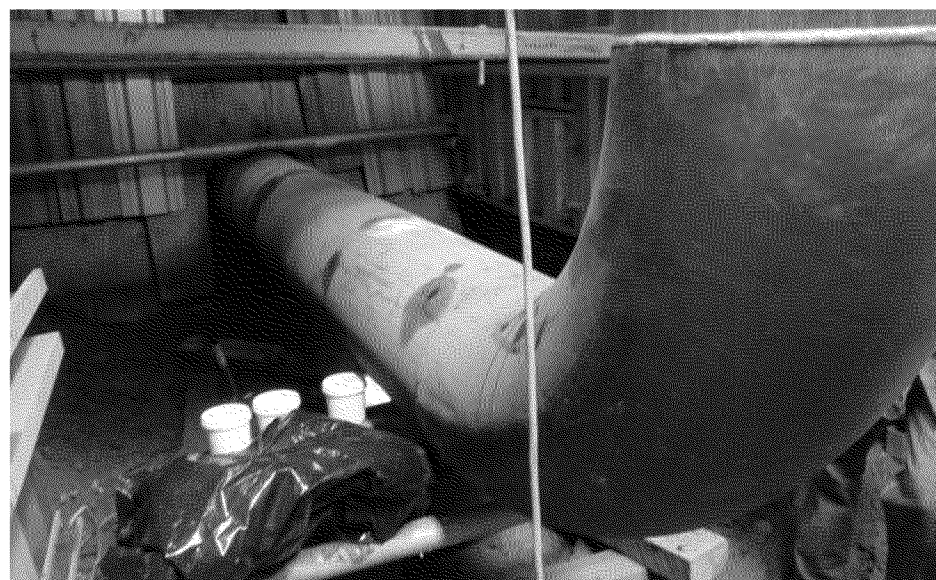
Overview of coating condition -1ft to 2ft, 9:00 position



Overview of coating condition 17ft to 20ft, 3:00 position



Overview of coating condition 17ft to 20ft, 3:00 position



Overview of coating condition 17ft to 20ft, 9:00 position

g



Overview of coating condition 17ft to 20ft, 9:00 position



Overview of MPI layout -1ft to 2ft, 3:00 position

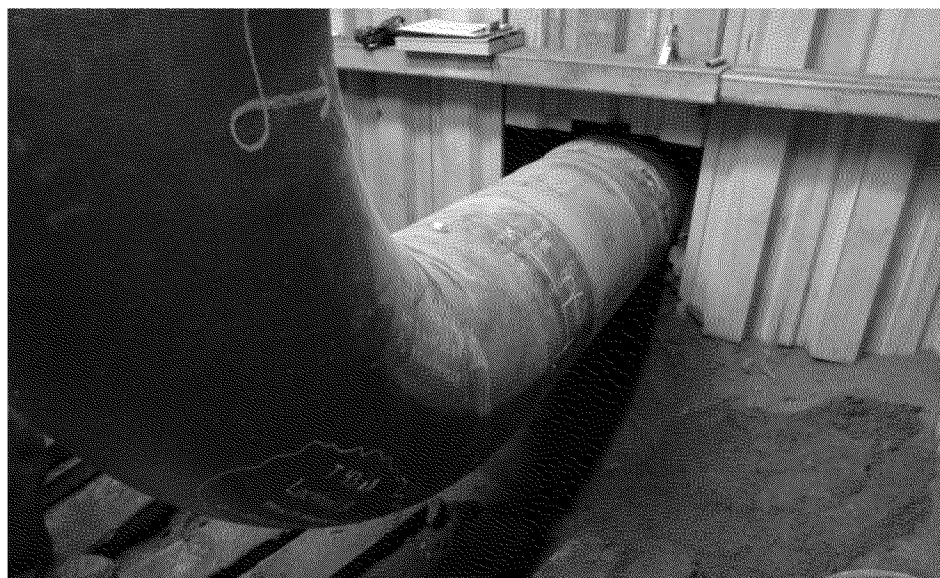


Overview of MPI layout -1ft to 2ft, 3:00 position



Overview of MPI layout -1ft to 2ft, 9:00 position

g



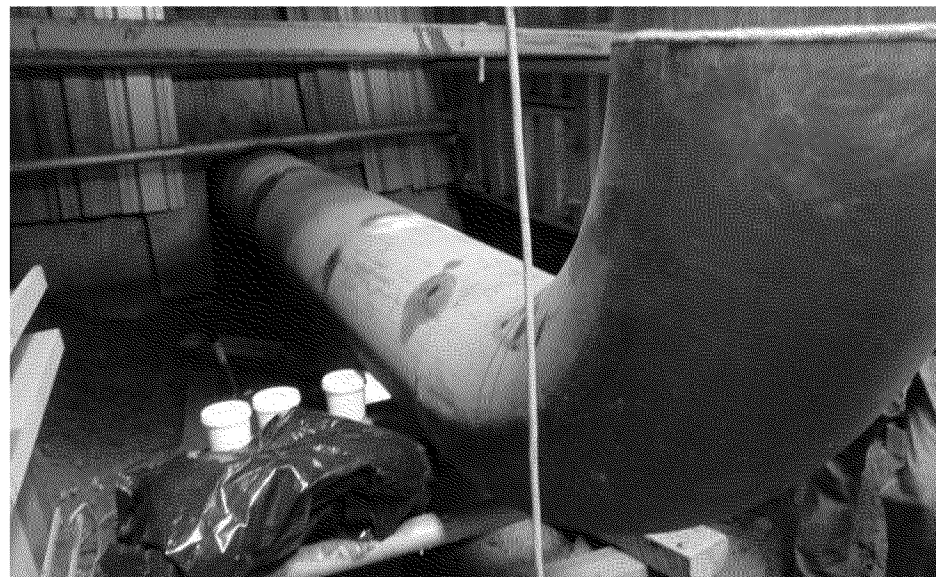
Overview of MPI layout -1ft to 2ft, 9:00 position



Overview of MPI layout 17ft to 20ft, 3:00 position



Overview of MPI layout 17ft to 20ft, 3:00 position

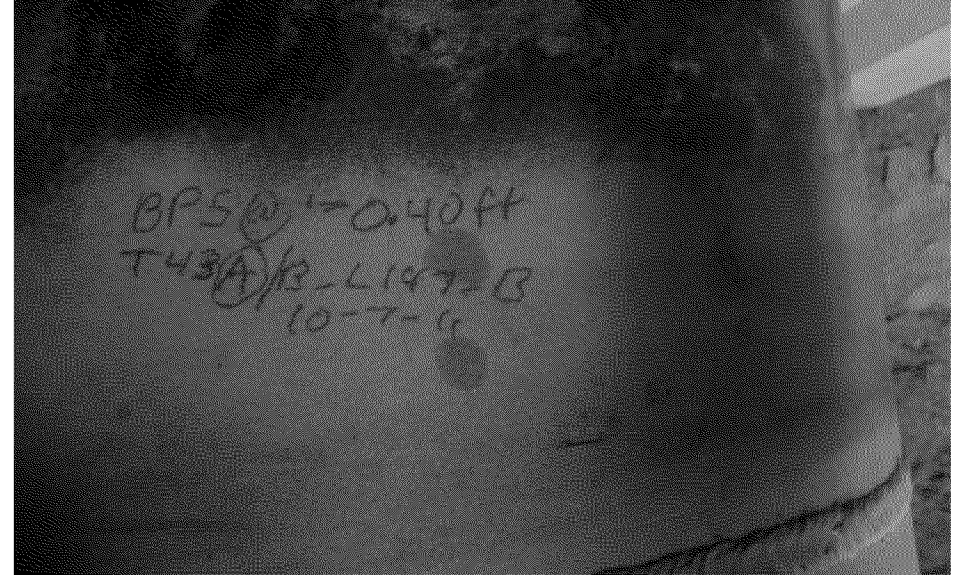


Overview of MPI layout 17ft to 20ft, 9:00 position

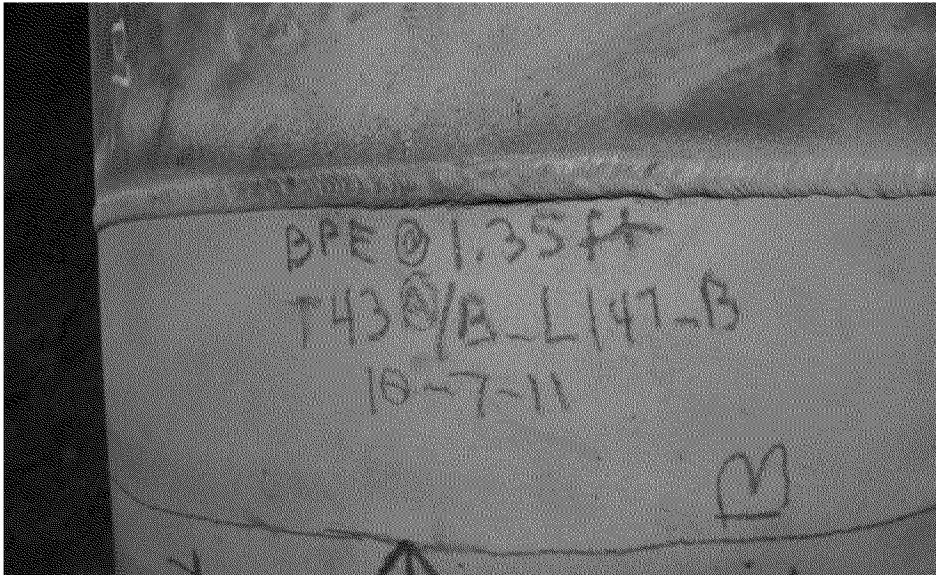
g



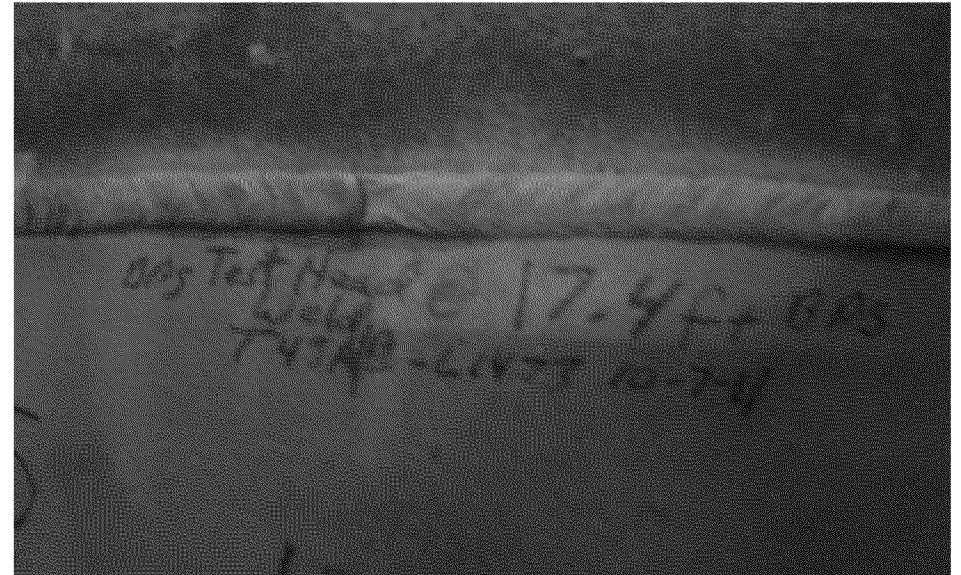
Overview of MPI layout 17ft to 20ft, 9:00 position



Overview of bare pipe start

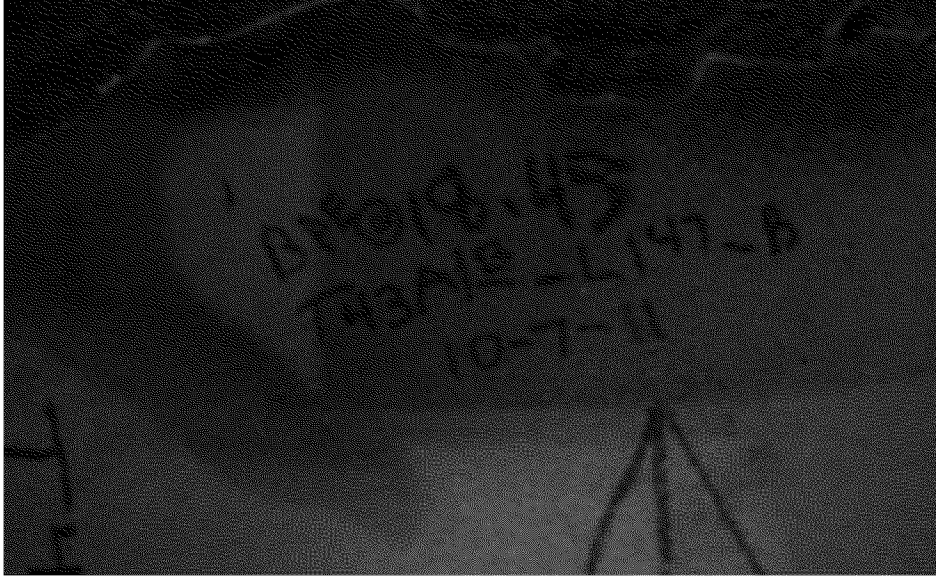


Overview of bare pipe end

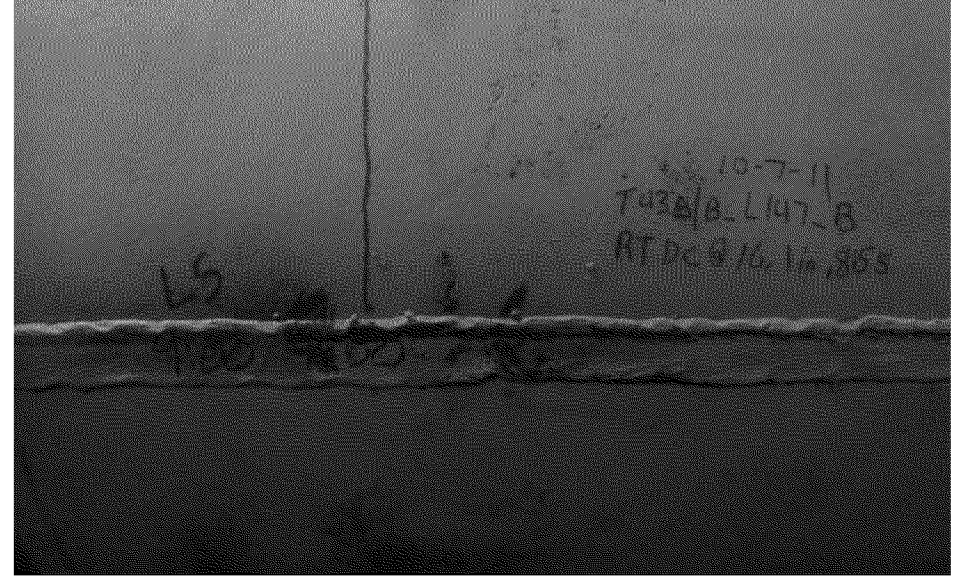


Overview of bare pipe start

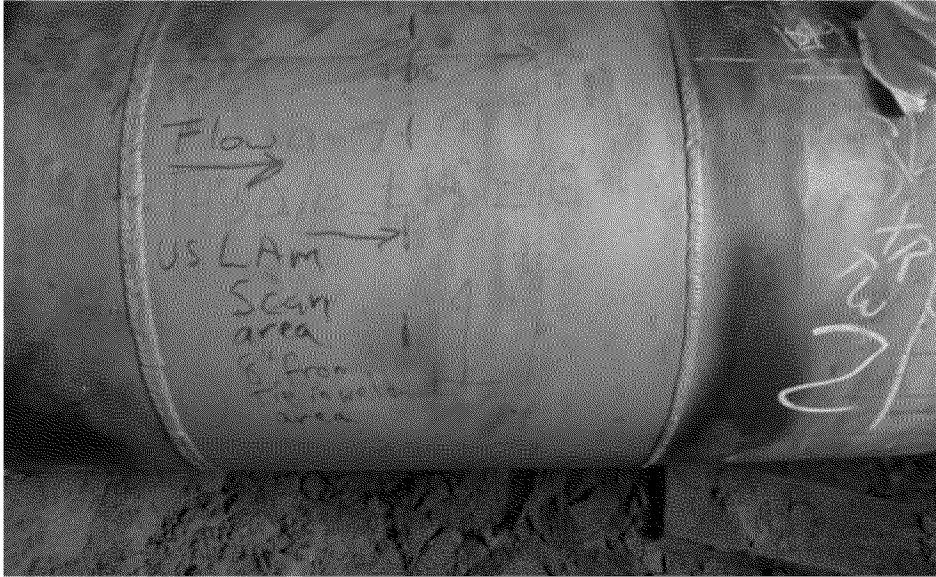
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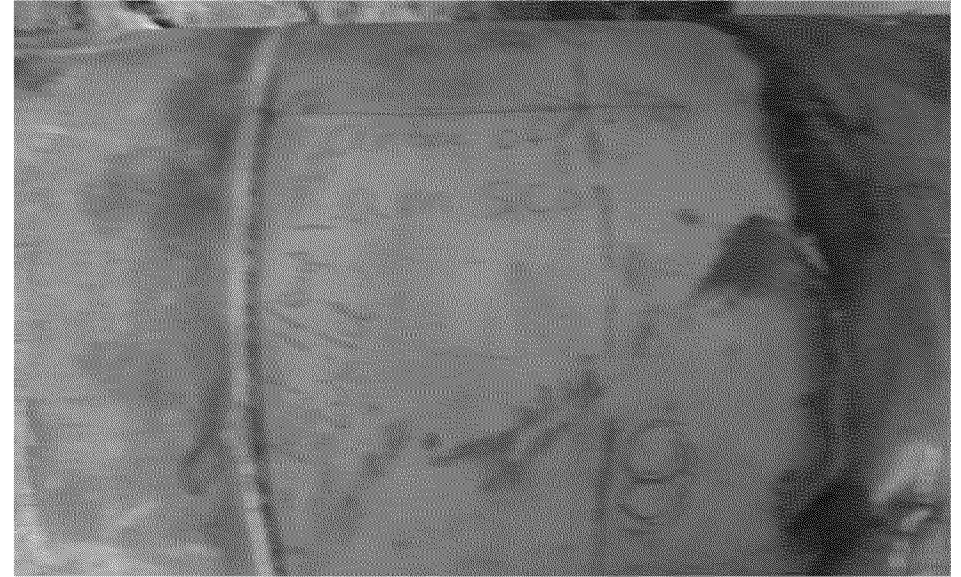
Overview of bare pipe end



Overview of feature joint long seam @ 8:55



Overview of US lamination scan area.



Overview of DS lamination scan area.

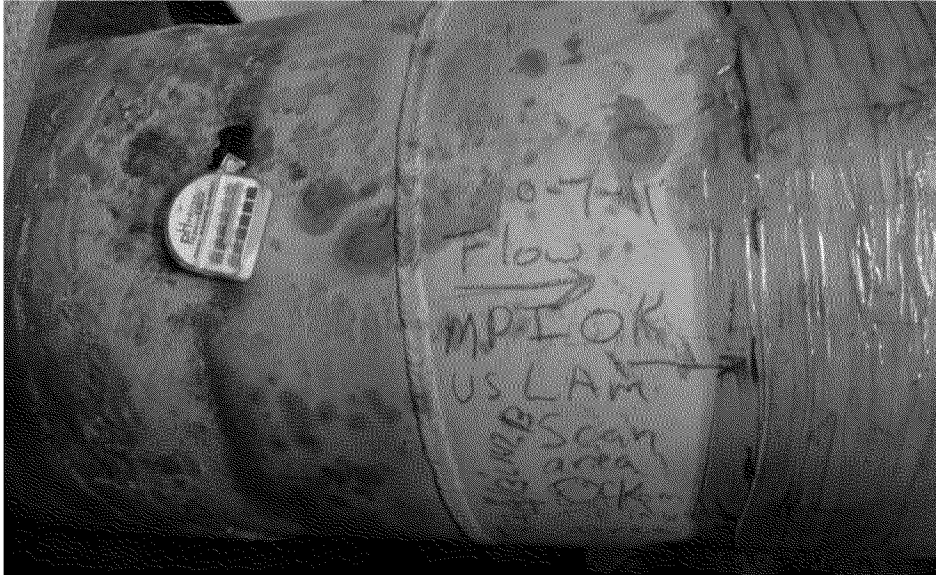
g



Overview of US MPIOK and Lamination scan OK.



Overview DS of MPIOK and Lamination scan OK.



Overview of pipe Ph.



Closeup of pipe Ph.

g



Removed pipe section coating assesment 3:00



Overview of coating condition 3:00 position



Overview of coating condition 3:00 position



Overview of coating condition 3:00 position

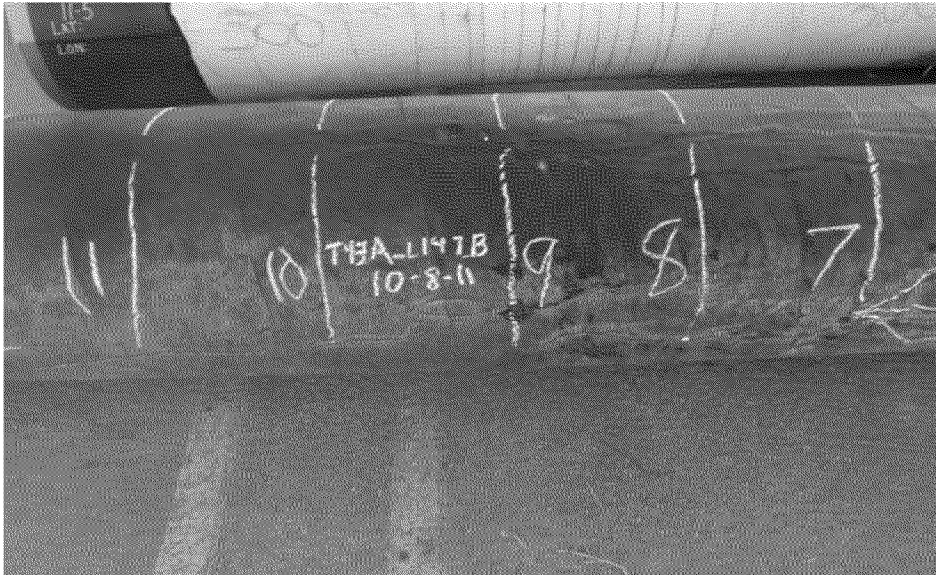
g



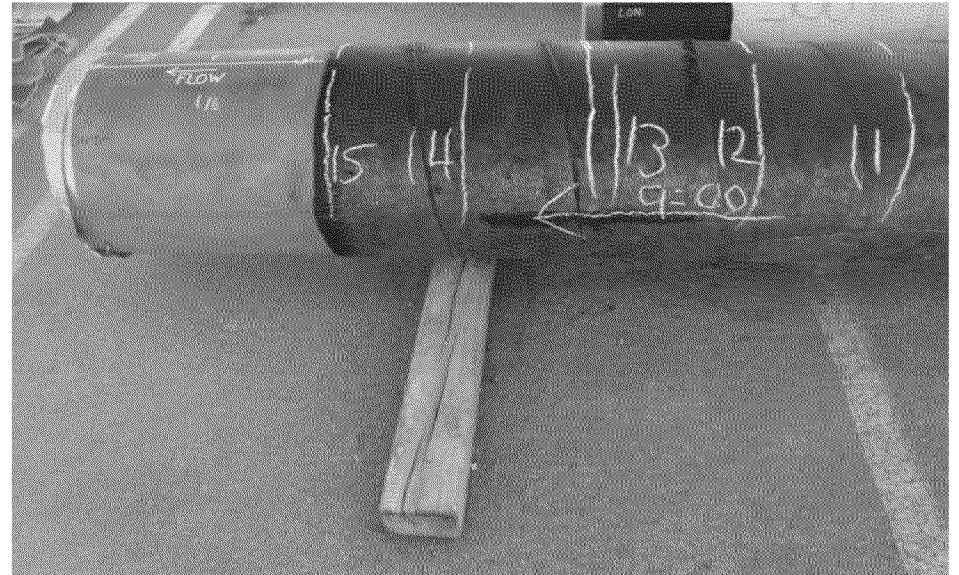
Removed pipe section coating assesment 9:00



Overview of coating condition 9:00 position

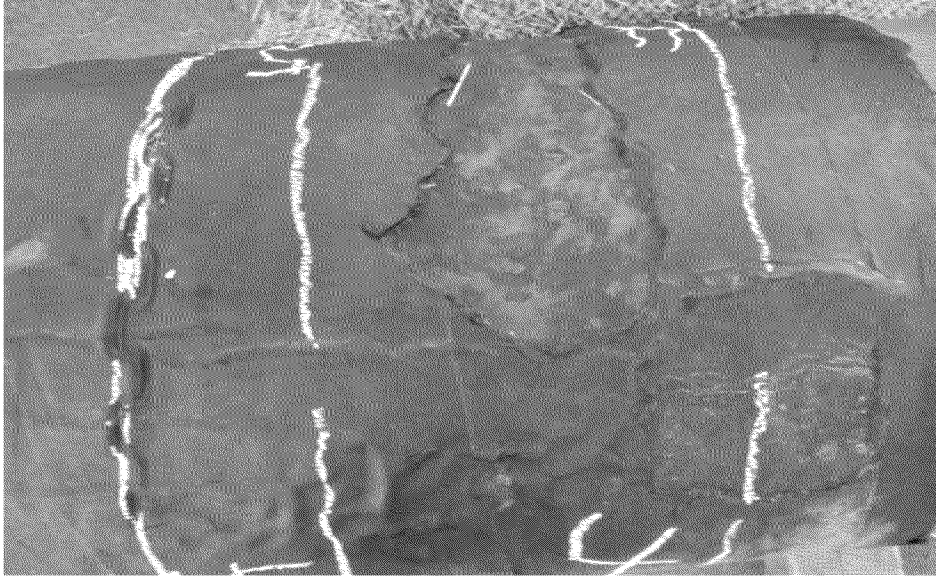


Overview of coating condition 9:00 position

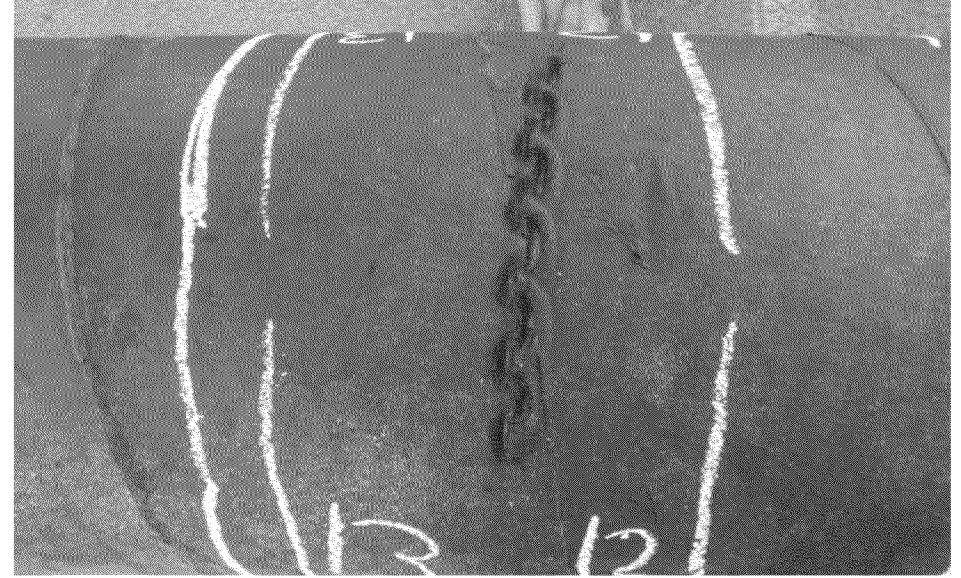


Overview of coating condition 9:00 position

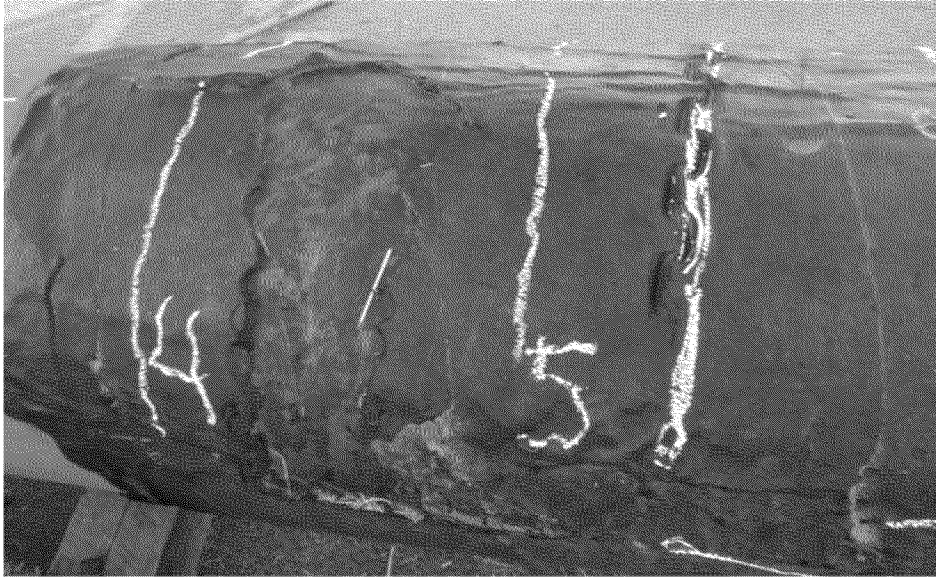
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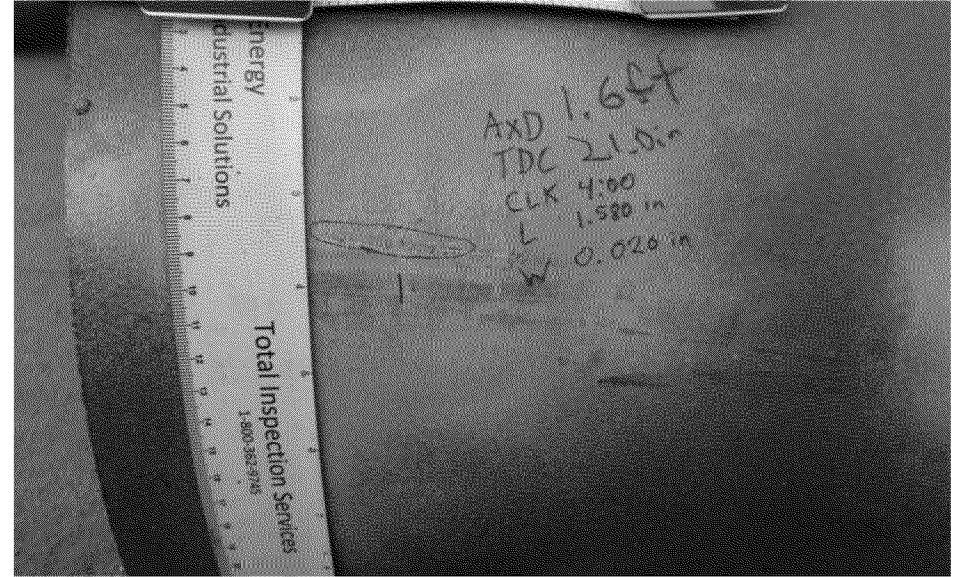
Coating damaged from removal process.



Coating damaged from removal process.

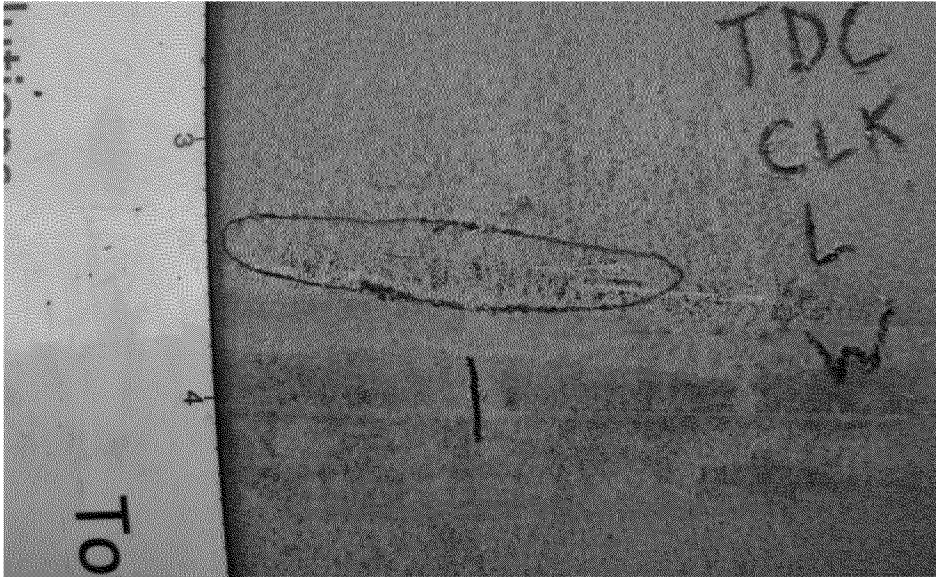


Coating damaged from removal process.

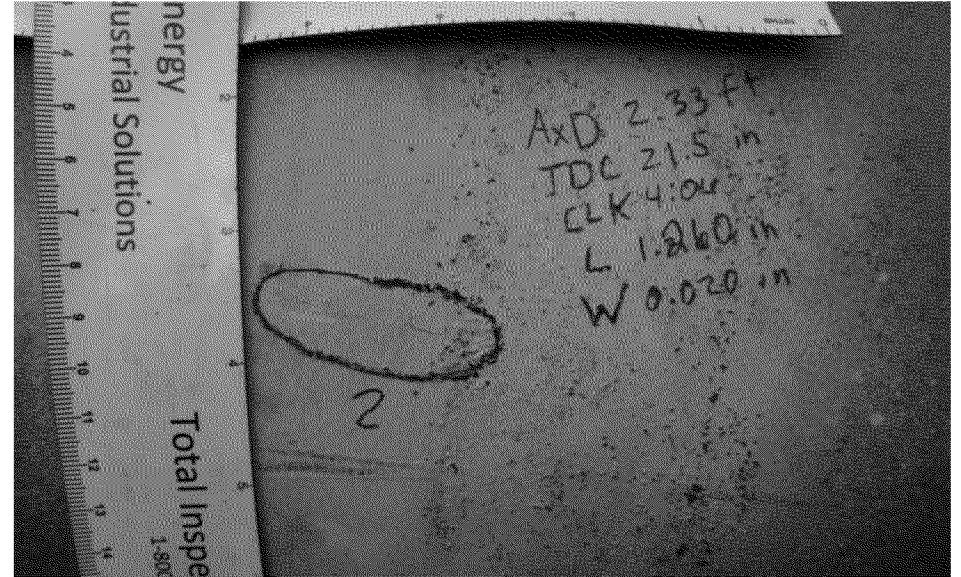


Removed pipe section linear indication-01

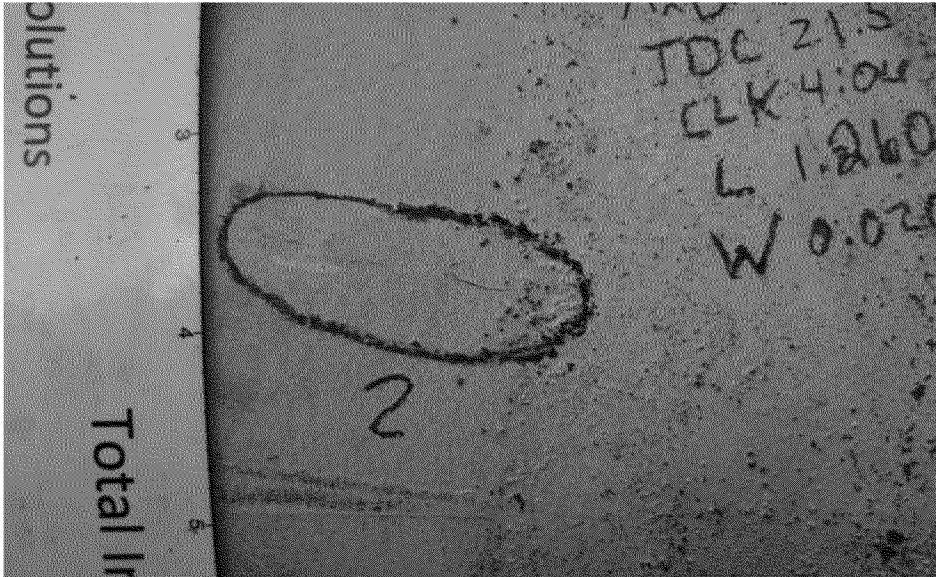
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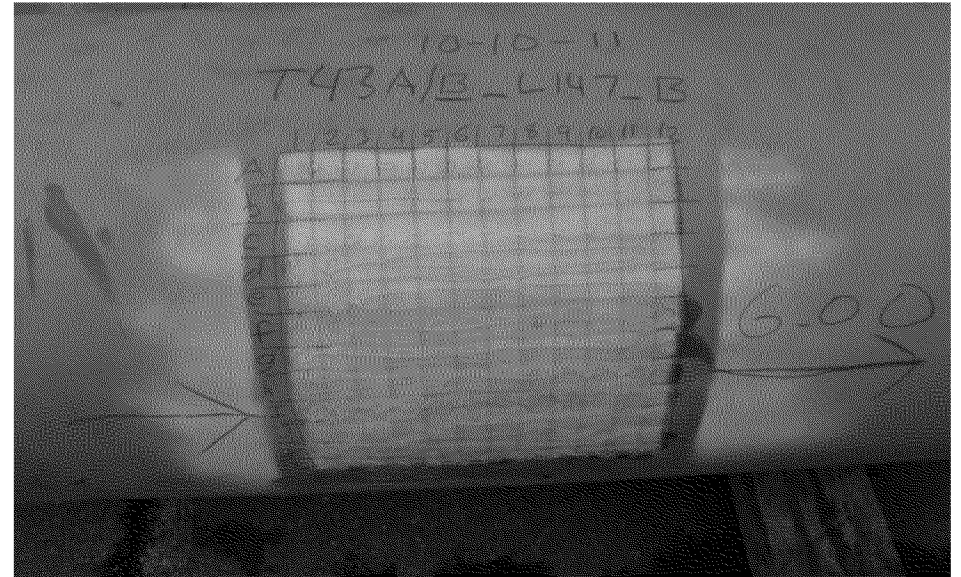
Close up of MT Indications of LIN-01



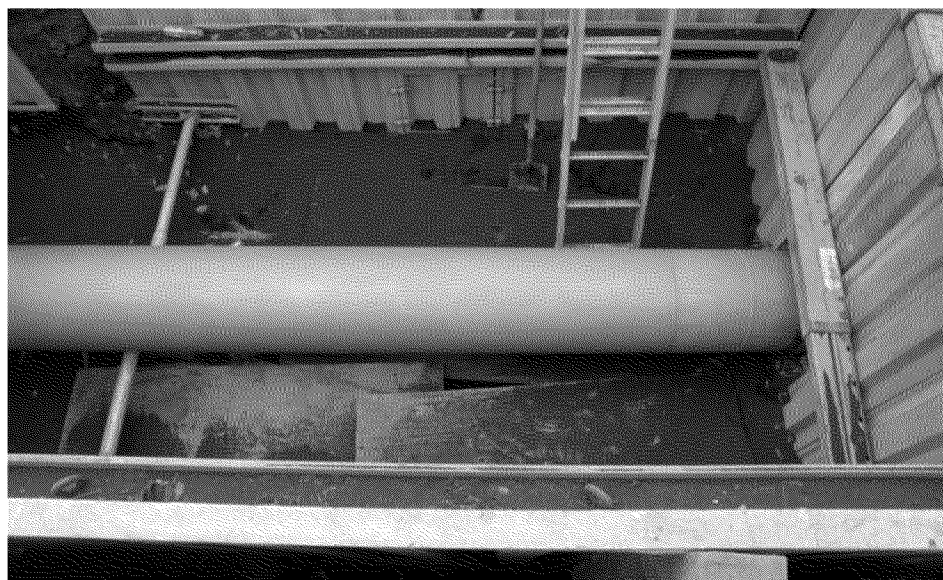
Removed pipe section linear indication-02



Close up of MT Indications of LIN-02



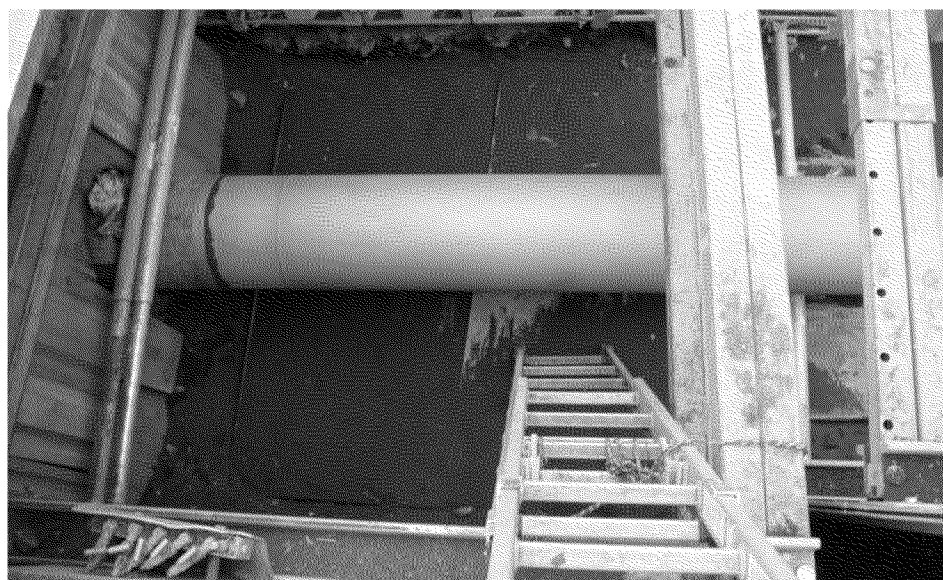
Overview of UT Grid.



Overview of clean blasted inspection area prior to recoat activities



Overview of clean blasted inspection area prior to recoat activities



Overview of clean blasted inspection area prior to recoat activities

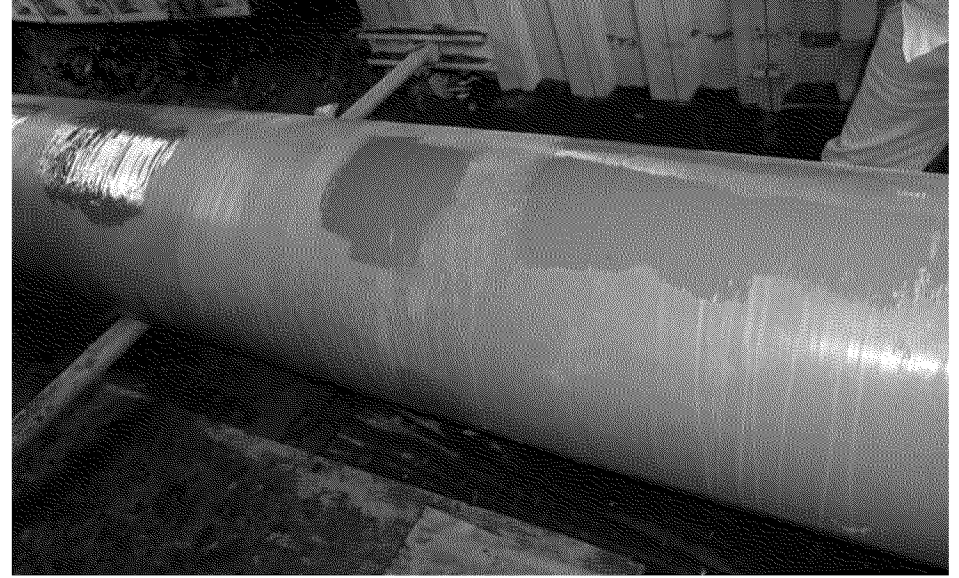


Overview of final coating condition US 3:00

g



Overview of final coating condition 3:00



Overview of final coating condition 3:00



Overview of final coating condition 3:00



Overview of final coating condition US 3:00

g



Overview of completed Slurry



Overview of completed Slurry



Overview of completed Cover looking upstream



Overview of completed Cover looking downstream

g



Overview of completed Cover, 3:00 view



Overview of completed Cover, 9:00 view

g

EXHIBIT E

Failure Analysis Associates

Exponent[®]

**PG&E Line 147 Britton
and Rogers Avenue Leak:
Metallurgical Analysis**



**PG&E Line 147 Britton
and Rogers Avenue Leak:
Metallurgical Analysis**

Prepared by:

A handwritten signature in black ink, appearing to read "Brad James".

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October 2013

Exponent, Inc.

Doc. no. 1306838.000 A0T0 1013 RE15

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Appendix A Microhardness Testing

Executive Summary

Exponent Failure Analysis Associates (Exponent) has been retained by Pacific Gas and Electric (PG&E) to help determine the cause of the leak identified in Line 147 along Brittan Avenue in San Carlos, California, and why the leak was not detected during a recent hydrostatic test (hydrotest). The subject leak was identified on October 18, 2012, and the hydrotest had been performed approximately one year earlier, on October 24, 2011.

Exponent's metallurgical investigation of the leak followed work conducted by Anamet laboratories. Our work included visual, metallographic, fractographic, and chemical analysis of the leak site. Our analysis largely agreed with the opinions presented by Anamet: the leak occurred within a weld repair section, all cracking occurred during the repair itself, with no metallographic or fractographic evidence that any crack growth occurred following the repair weld. Specifically, there was no evidence of progressive crack growth due to fatigue, stress corrosion cracking (SCC) or ductile tearing from the "pressure reversal" phenomenon occasionally observed during hydrotesting. Significant deposits were observed within the cracks. These deposits were largely iron-oxide based, although high levels of sulfur (likely associated with mercaptan-odorizer present in the natural gas) were identified.

The subject leak was caused by cracking that occurred within a location on the pipe body that had been repaired using weld-metal deposition ("weld repair"). This weld repair was not associated with either a girth or longitudinal seam weld. The cracks associated with the leak within the outer diameter (OD) weld were caused by solidification cracking during the weld repair. Cracks that initiated along the pipe inner diameter (ID), within the heat-affected zone (HAZ) beneath the repair weld were also observed. The HAZ exhibited significant grain coarsening with areas of Widmanstatten ferrite along the prior-austenite grain boundaries. Areas of fracture along the prior-austenite grain boundaries were observed, indicative of the low-toughness associated with severely-coarsened grains, possible segregation of impurity elements (such as sulfur and phosphorus), and high residual stresses from the weld repair. Microhardness testing indicated hardness levels less than 190 HV (approximately 90 on the Rockwell B Scale) within the HAZ. At this low hardness level, hydrogen embrittlement is unlikely to have contributed to the intergranular fracture observed within the HAZ. Like the solidification cracking observed at the pipe outer diameter, these HAZ cracks occurred during or shortly after the weld was made as the metal cooled.

The cracks showed no evidence of propagation over time. The relatively large pressures associated with the hydrotest were insufficient to grow the subject cracks. The subject leak was not detected during hydrotesting. The primary purpose of hydrotesting is to help establish pipeline integrity and find large-scale leaks. The leak path was small, full of oxide, and provided a tortuous path for liquid water to escape.

Background

PG&E Line 147 connects Lines 132 and 101, and extends along a portion of Brittan Avenue in San Carlos, California. The maximum allowable operating pressure (MAOP) of Line 147 documented on the hydrotesting test report was 400 psig.¹ The portion of Line 147 that contained the leak was installed in 1957.²

On October 24, 2011, Line 147 was hydrotested between mile posts 1.95 and 3.4.¹ The 8.32-hour-long hydrotest was conducted at a minimum sustained pressure of 607 psig (at the maximum elevation), and included a 30-minute pressure spike to 748 psig (maximum). Thus, the hydrotest was conducted at a pressure in excess of 50-percent greater than the Line 147 MAOP. The hydrotest was certified by RCP Inc.¹ to meet the requirements of the Federal Code of Regulations, Title 49, Part 192, Subpart J for a Class 3 location. The buried pipe segment (7,541 feet) gained 2-degrees F fluid temperature, and the exposed pipe segment (175 feet) lost 3-degrees F over the test period. Given the coefficient of thermal expansion of water, a variation of 1-degree Fahrenheit is equal to 10.14 gallons of water. Thus, a small hydrostatic test leak would have been within the inherent error associated with the test.

On October 13, 2012, approximately one-year after the Line 147 hydrotest, a PG&E gas crew leader observed bubble formations in water associated with an excavation on Brittan Avenue. PG&E testing on October 15, 2012 confirmed the gas leak near the intersection of Brittan Avenue and Rogers Avenue. On November 13, a 6-inch PLIDCO cap was welded over the leak site (50-foot east of Rogers Avenue on Brittan Avenue) at the bottom (6 o'clock position) of the pipe.

Exponent conducted a metallurgical analysis to help determine the cause of the leak and why the leak was not detected during hydrotesting. Our analysis included visual, fractographic, metallographic, and chemical analysis of the leak and associated welds/piping. The results of our investigation are described below.

¹ RCP Inc., Hydrostatic Test Certification, March 15, 2012.

² PG&E Leak Repair, Inspection and Gas Quarterly Incident Report (A-Form), 58-12-60279- updated.

Non-Destructive Examination

The portion of Line 147 that contained the subject leak was initially examined by Anamet Inc. (Anamet). As described in their September 6, 2013 report, Anamet conducted leak testing, metallographic analysis, as well as tensile and Charpy V-notch (CVN) testing of the subject pipe. The subject leak and adjacent pipe were transferred from Anamet to Exponent; received by Exponent on September 23, 2013 in the condition shown in Figure 1 and Figure 2.



Figure 1. Photograph of the section of L-147 containing the crack and the PLIDCO cap welded over it to stop the gas leak. The red box shows the area magnified in Figure 3. Note the sectioning of the pipe and the yellow markings were made by Anamet.



Figure 2. Photograph of a section of L-147 removed from the section of pipe containing the crack. Note the sectioning of the pipe and the yellow markings were made by Anamet.

The leak site was located in the area in the red box in Figure 1; enlarged in Figure 3. A PLIDCO cap had been welded onto the pipe to stop the leak until the subject pipe section could be removed. Beneath the cap, several weld repairs had been conducted. Anamet had sectioned the approximately 0.4-inch long crack into two pieces, then mounted, polished and etched the parts for analysis. The two metallurgical mounts are shown in Figure 4 as received from Anamet. Exponent retained Anamet's sample ID numbers, which for the metallurgical mounts are A-1-1-8 and A-1-1-7, left and right, respectively in Figure 4. As indicated in Anamet's report, these samples were subjected to serial grinding to evaluate different leak cross-sections. As such, portions of the leak that have been ground-away are no longer available for examination.

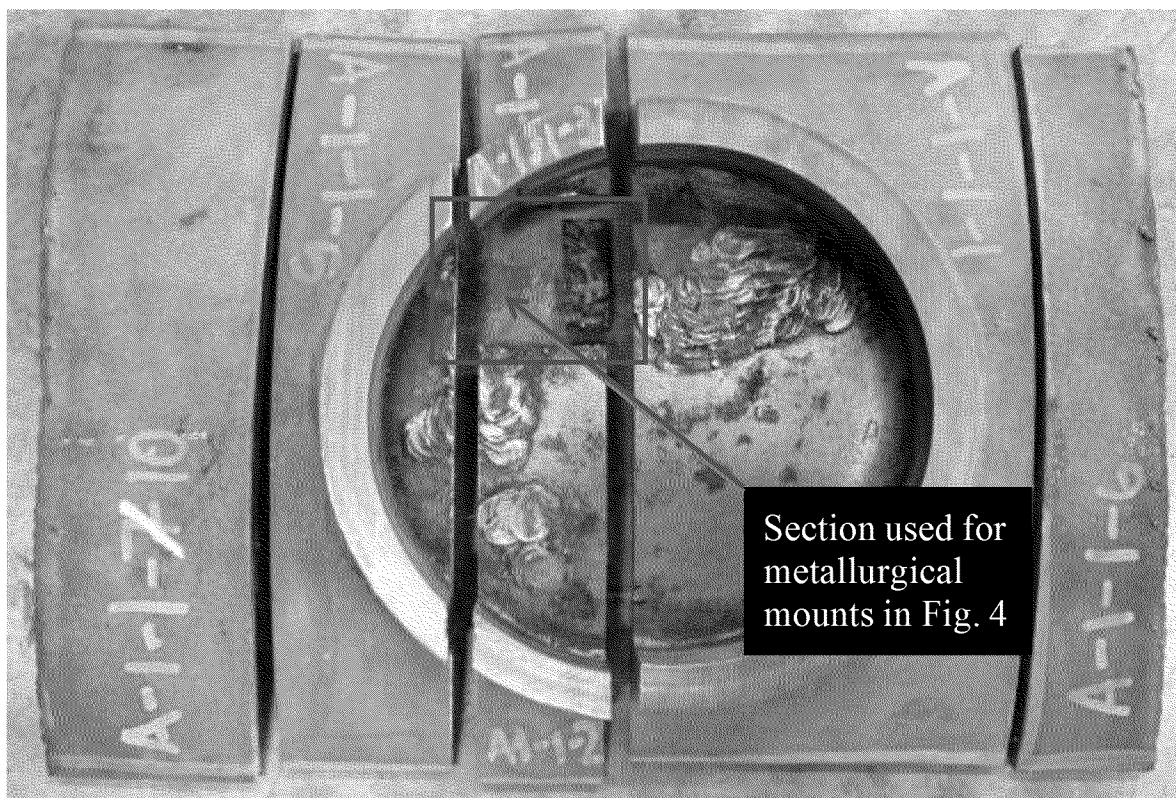


Figure 3. Photograph of the section of L-147 (boxed in red in Figure 1) containing the crack and the PLIDCO cap. Note the sectioning of the pipe and the yellow markings were made by Anamet.

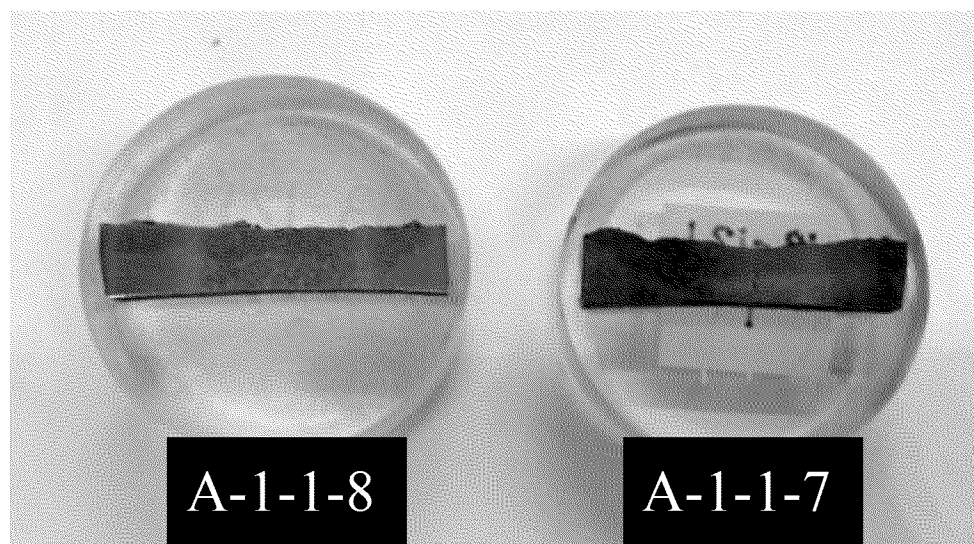


Figure 4. Photograph of the metallurgical mounts of the area containing the crack in L-147 under the PLIDCO cap. Note the metallurgical mounts were made by Anamet: Exponent retained Anamet's sample ID numbers A-1-1-8 (left); A-1-1-7 (right).

Fractographic Examination

Optical Microscopy

Exponent extracted each of leak sections remnants that had been encapsulated by Anamet in metallographic mounts, cooled them in liquid nitrogen, and then fractured them to analyze the leak surfaces. Optical microscope images of the post-fractured leak surfaces are shown in Figure 5 and Figure 6. The dark portions of each sample are the pre-existing crack/leak locations. The brighter-colored areas occurred when Exponent broke the samples open to reveal the leak surface.

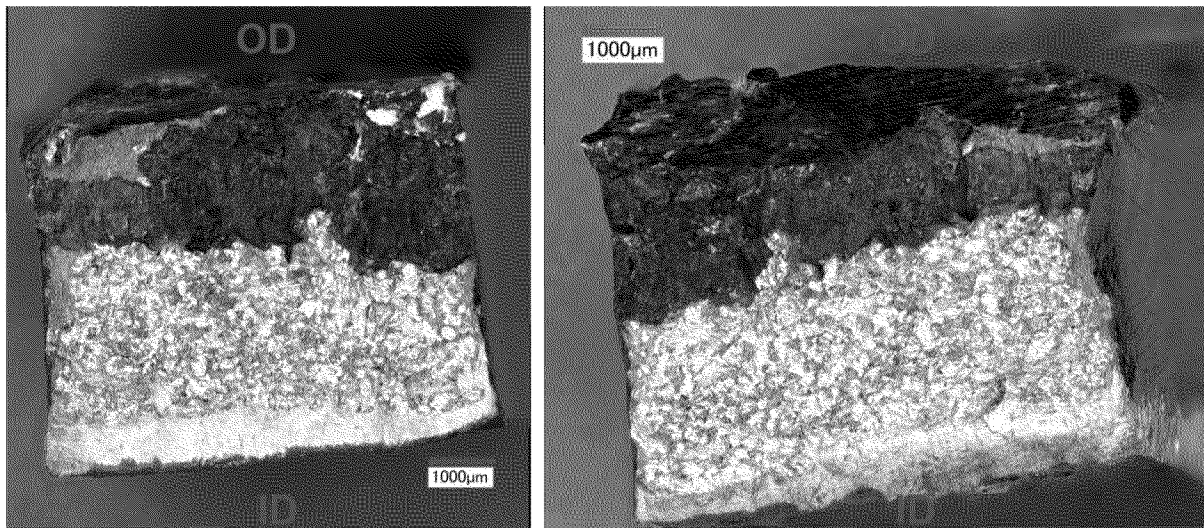


Figure 5. Optical micrographs of the leak surface after opening Anamet's A-1-1-8 metallurgical mount.

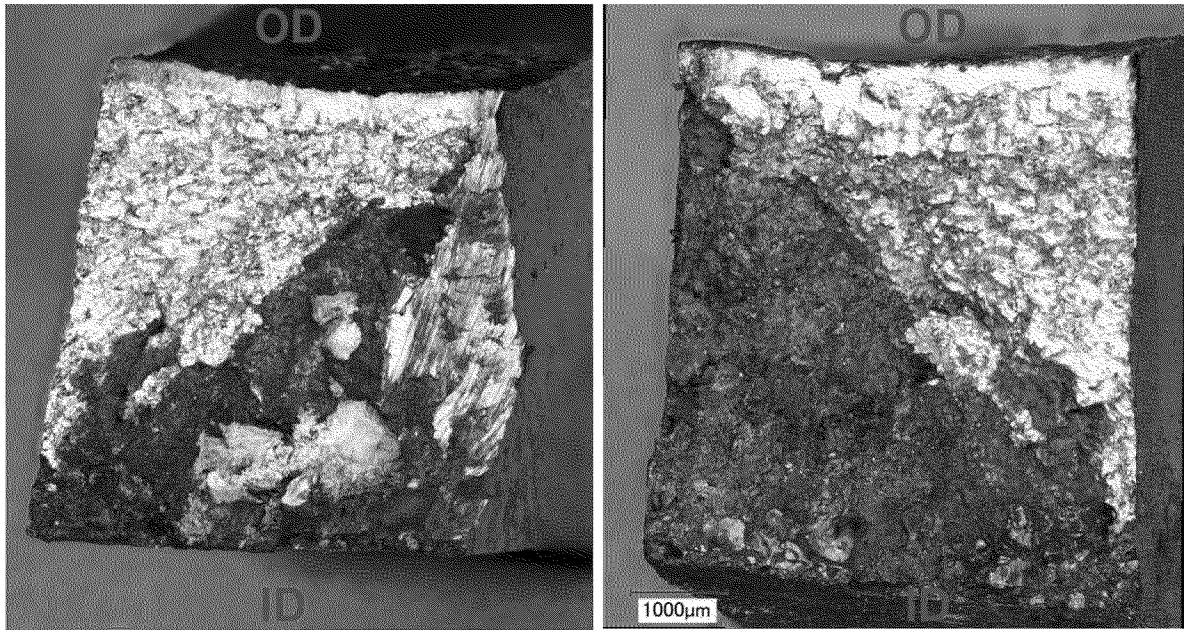


Figure 6. Optical micrographs of the leak surface after opening Anamet's A-1-1-7 metallurgical mount.

As shown in Figure 5, the pre-existing crack in Sample A-1-1-8 only extended from the OD approximately halfway through the pipe wall. The pre-existing crack A-1-1-7 extended from the ID nearly to the OD surface. While neither of these two samples display a clear ID-to-OD leak path, the pre-existing crack in Sample A-1-1-7 extends nearly through the pipe wall thickness. Based on the metallographic images in Anamet's report, as well as fractographic analysis of the remaining broken-open metallographic specimens, it is apparent that the through-wall (ID-to-OD) path for the subject leak was less than the 0.4 inch total length of the cracks.

Scanning Electron Microscopy

The leak surface fracture morphologies were analyzed using SEM/EDS. SEM images of the Sample A-1-1-8 fracture surface are shown in Figure 7. Interdendritic fracture morphology was observed at the pre-existing OD fracture area, consistent with cracking that occurred during cooling of the original weld (known as solidification or "hot cracking"). Solidification cracking occurs when the final solidifying metal cannot support the thermally or mechanically-induced strain from the welding process, and can be caused by poor joint restraint, improper welding parameters, and by interdendritic segregation of steel impurities (such as sulfur). The fracture surface was heavily oxidized, also consistent with solidification cracks in welds.³ Brittle cleavage fracture morphology was observed on the bottom-half of the fractured Sample A-1-1-8. This cleavage fracture occurred when the sample was cooled in liquid nitrogen and then fractured to allow observation of the leak surfaces. Ductile tearing associated with the intentional fracture of Sample A-1-1-8 was observed at the inner surface. The ductile tearing is

³ ASM Handbook, Volume 6: Welding, Brazing, and Soldering, ASM International, 2003, pp. 649-651.

caused by a transition from a triaxial stress state to a biaxial stress state when the final ligament breaks, and results in a characteristic ductile “shear-lip” at the final fracture location.

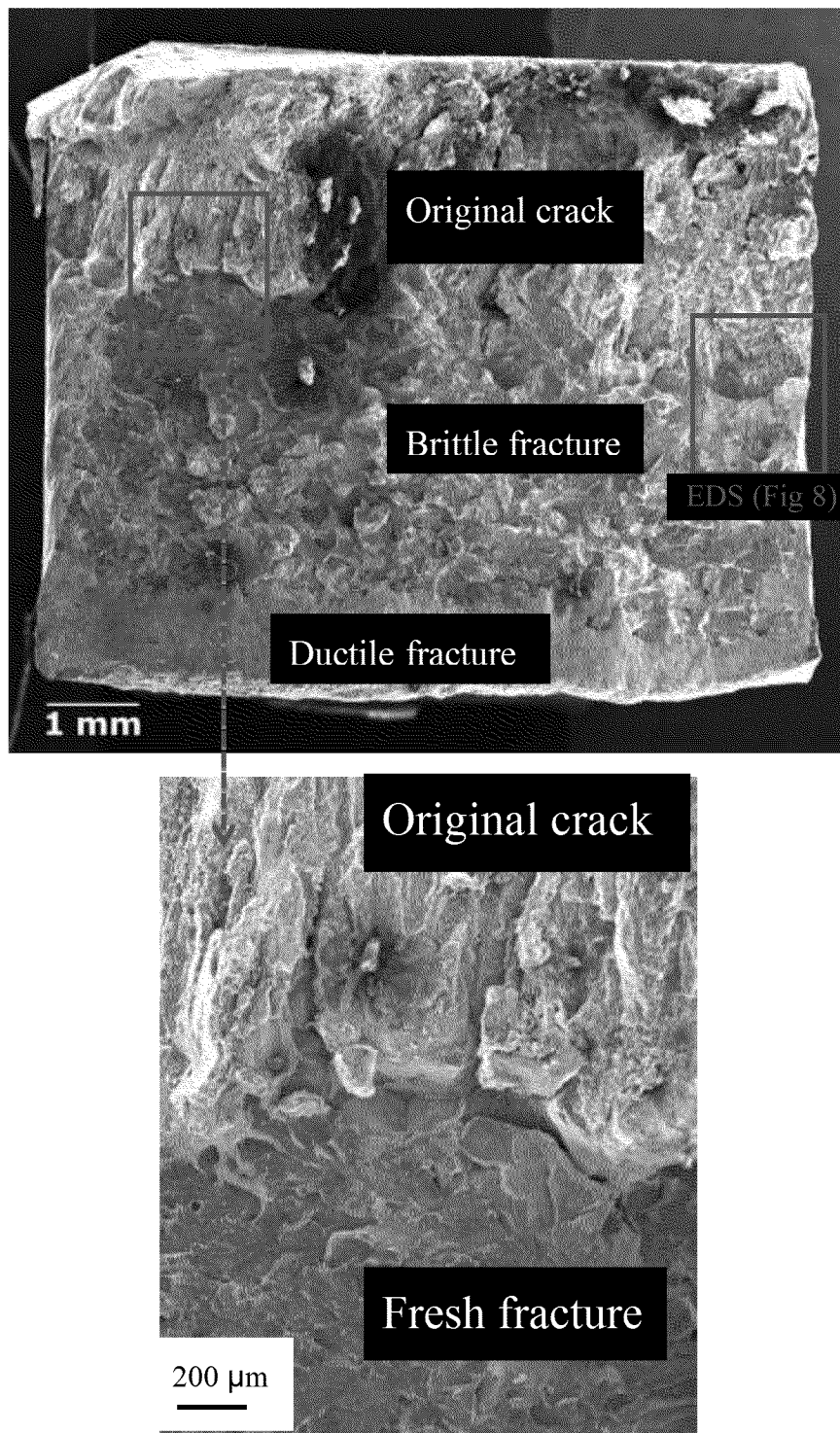


Figure 7. SEM images of Sample A-1-1-8 fracture surface (left side of Figure 5). Top image shows the entire surface with one red box magnified (bottom image) and another red box for the area analyzed with EDS in Figure 8.

The Sample A-1-1-8 fracture surface was examined using EDS, which is highlighted in the red box in top image of Figure 7 and presented in Figure 8. The freshly-induced cleavage fracture surface below shows only the presence of iron and a small amount of carbon. The original crack surface, however, exhibited significantly increased levels of carbon, oxygen and sulfur, consistent with iron oxide (rust) as well as sulfur deposits. The sulfur is most likely from mercaptan-based odorizer added to natural gas to give the characteristic “rotten-egg” smell.

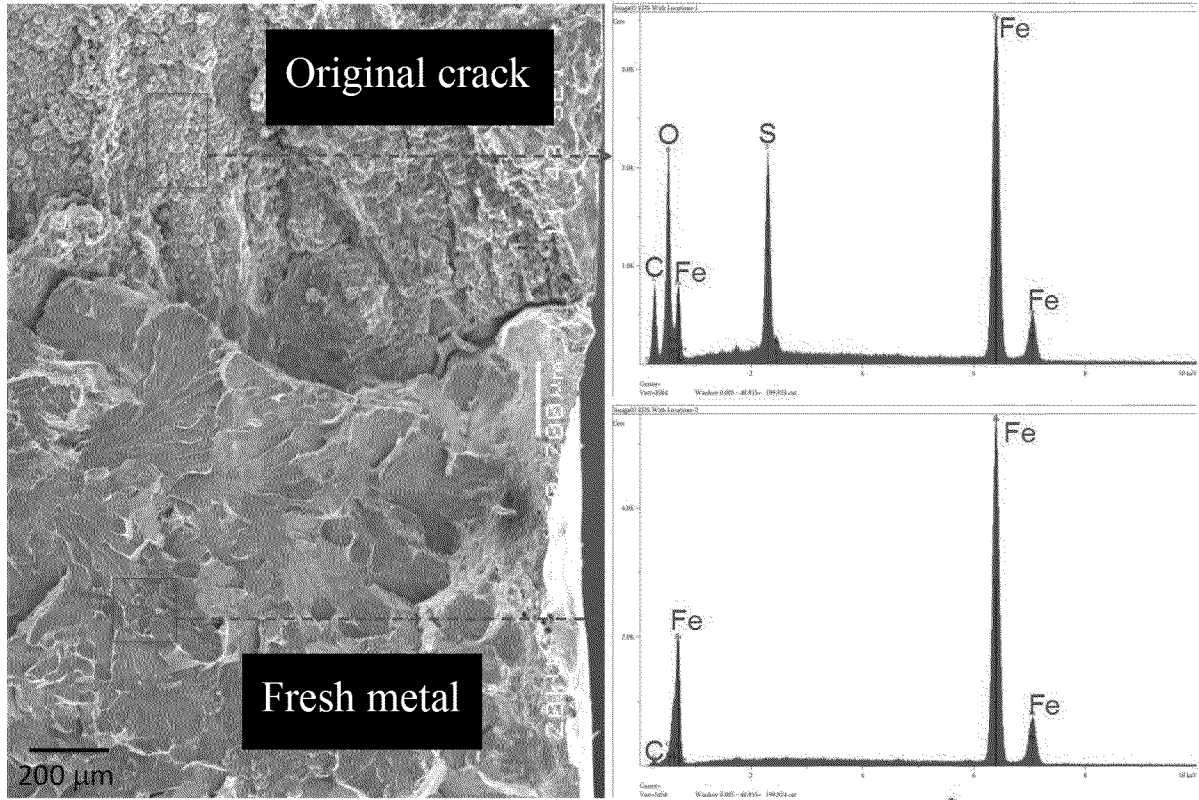


Figure 8. EDS analysis of the area in the red box in the right side of the top image in Figure 7. The lower portion is the freshly cracked surface; the top is the surface of the original crack composed of iron oxide with a large amount of sulfur, likely from the mercaptans added to give scent to the gas.

Similar SEM and EDS examination was performed on the Sample A-1-1-7 fracture surface faces, example images are shown in Figure 9 and Figure 10. The substantial oxide deposits on the original leak surface obscured much of fracture morphology in the original-cracked portion of Sample A-1-1-7, as shown in Figure 9. However, the transition between the original crack surface and the intentional brittle (cleavage) fracture area showed no evidence of progressive growth, also shown in Figure 9.

EDS analysis of the Sample A-1-1-7 fracture surface showed similar findings as exhibited in Sample A-1-1-8. The freshly-exposed brittle fracture surface showed primarily iron with a small amount of carbon, while the original leak surface exhibited significant amounts of carbon, oxygen, and sulfur, as shown in Figure 10.

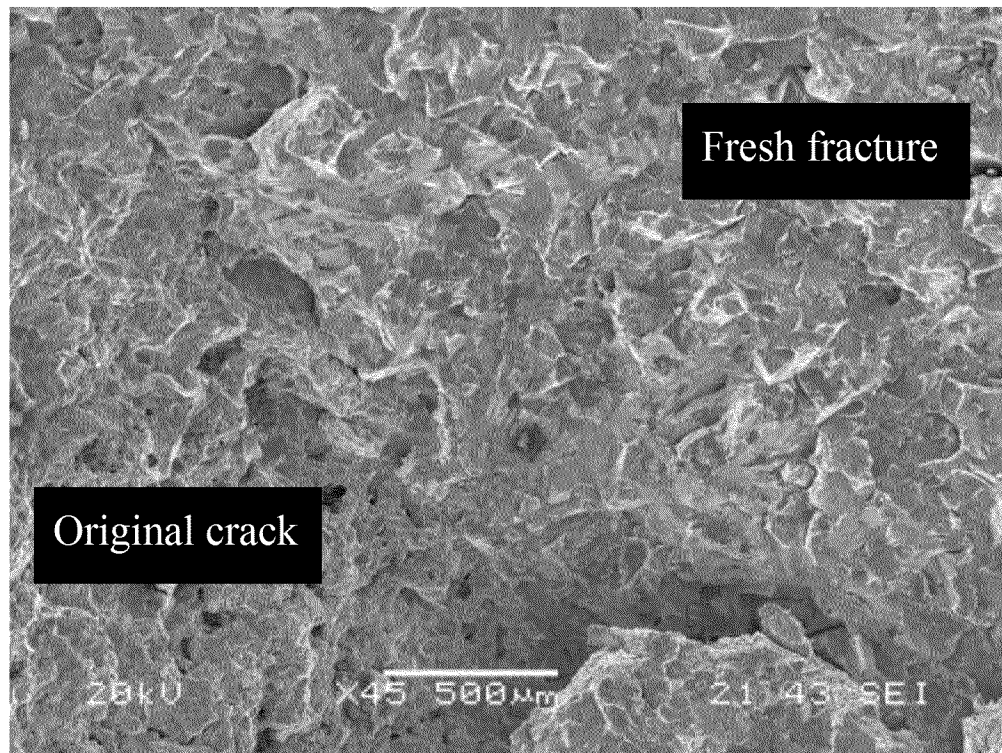
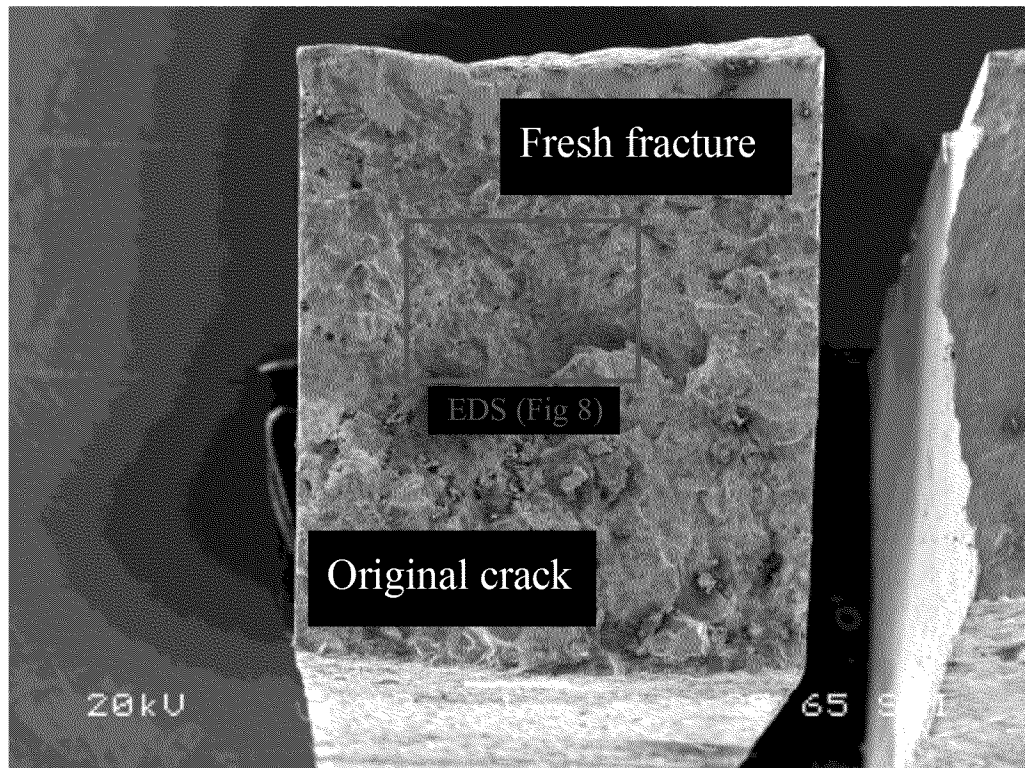


Figure 9. One side of the crack surface in Sample A-1-1-7 (right side of Figure 6). The red box shows the area analyzed with EDS in Figure 10.

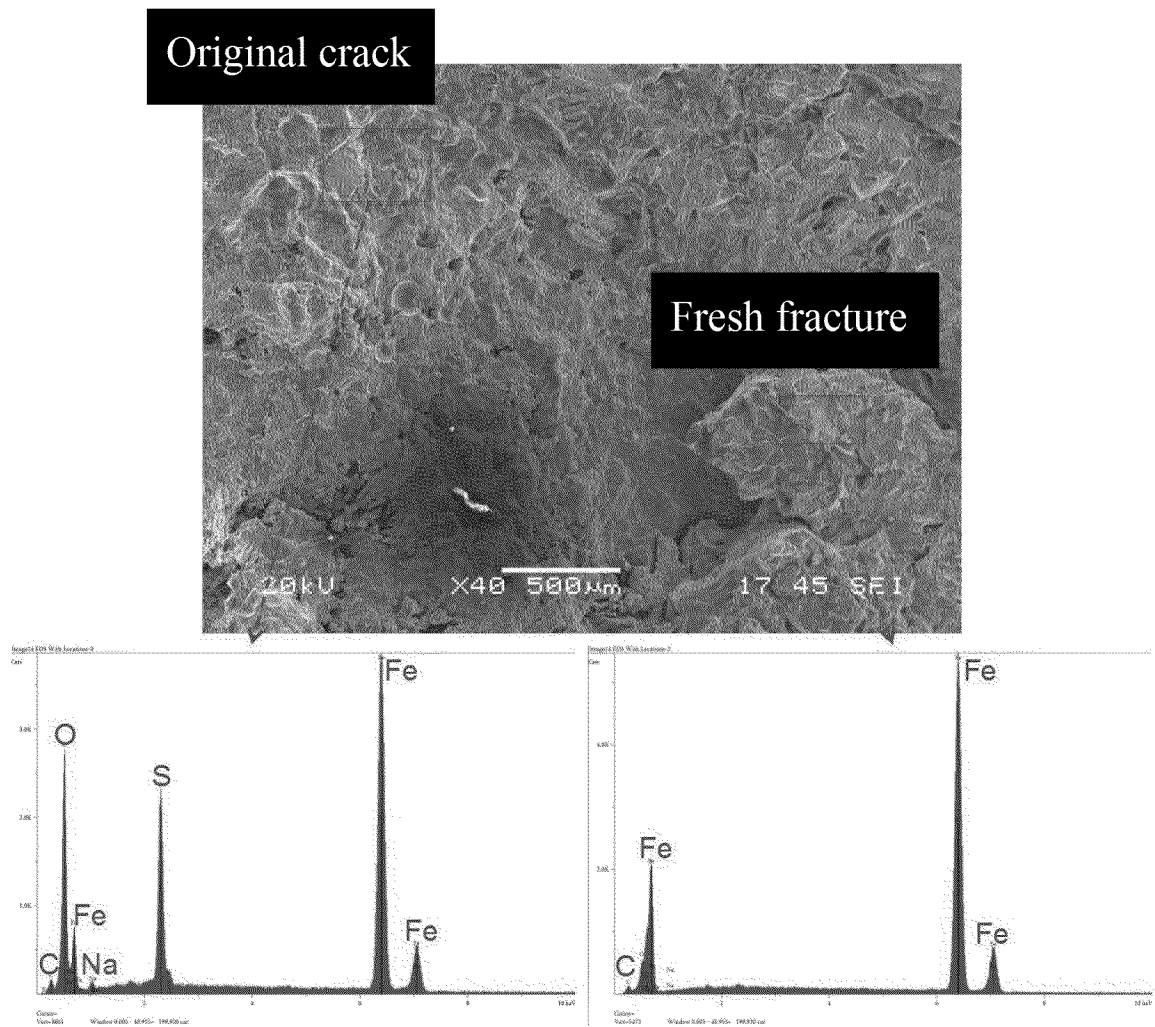


Figure 10. EDS analysis of the area in the red box in the top image in Figure 9. The right side is the freshly cracked surface; the left side is the surface of the original crack composed of iron oxide with significant sulfur.

Metallographic Analysis

Anamet sectioned the subject leak perpendicular to the longitudinal axis of the pipe, and conducted metallographic analyses as described in their September 6, 2013 report. A composite optical image from Anamet's report, shown here as Figure 11, shows that the weld repair contained significant weld porosity and cracks near the center of the weld bead that run parallel to the dendritic structure. There is also evidence of intergranular fracture in the heat-affected zone (HAZ) next to the weld.

Following our fractographic examination, Exponent put the broken halves of the crack back together for further metallographic analysis and microhardness testing, shown in Figure 12 and Figure 13. The samples were re-polished and etched with two-percent nital solution. Like Anamet's analysis, significant porosity and interdendritic cracking were observed within the repair weld. The HAZ below the weld was characterized by grain coarsening with Widmanstatten-morphology pro-eutectoid ferrite, shown in Figure 14. The very large grains within the HAZ and the solidification cracking of the weld pool are both consistent of slow weld speeds with high heat input.

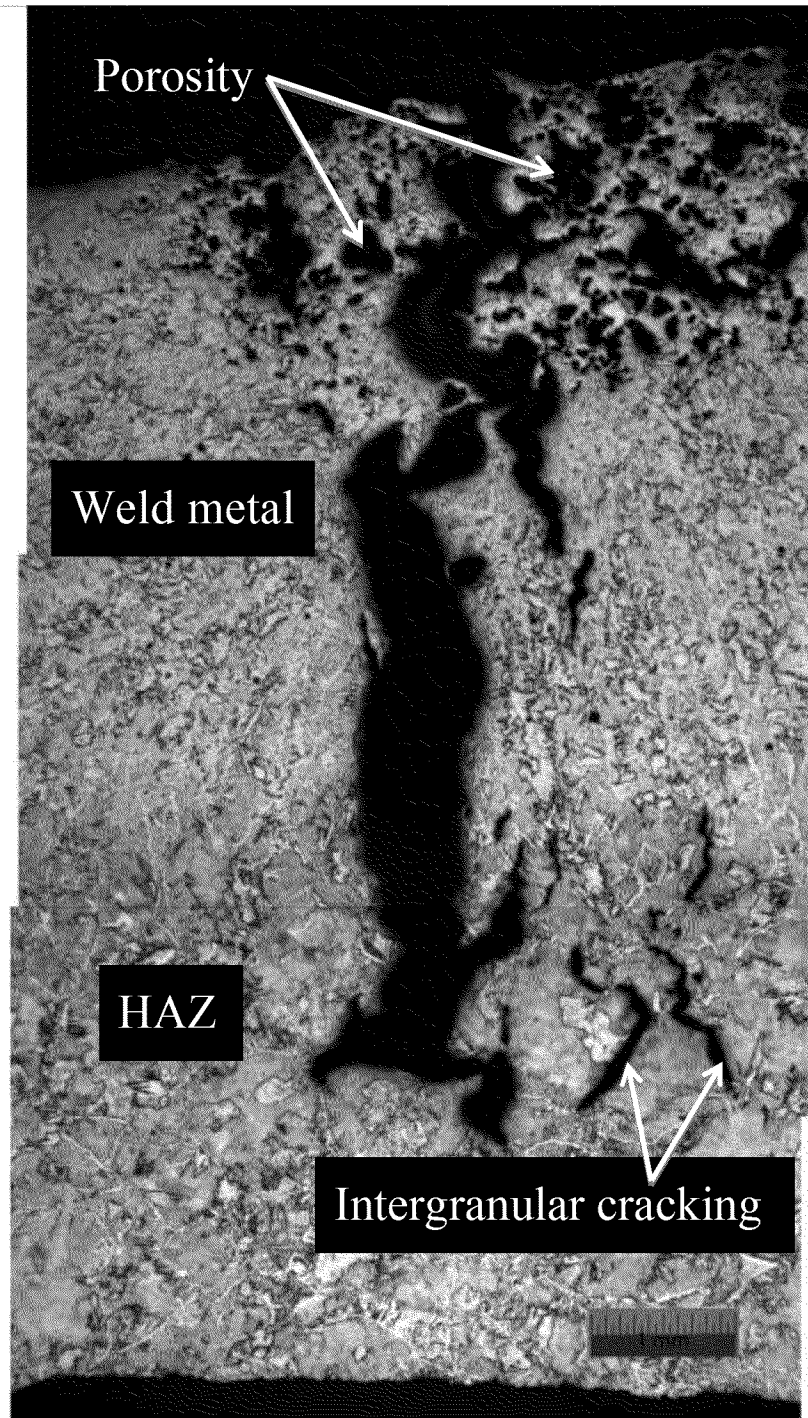


Figure 11. Composite optical micrograph of a metallurgical mount prepared by Anamet. Image reproduced from the September 6, 2013 Anamet report with permission from Anamet.

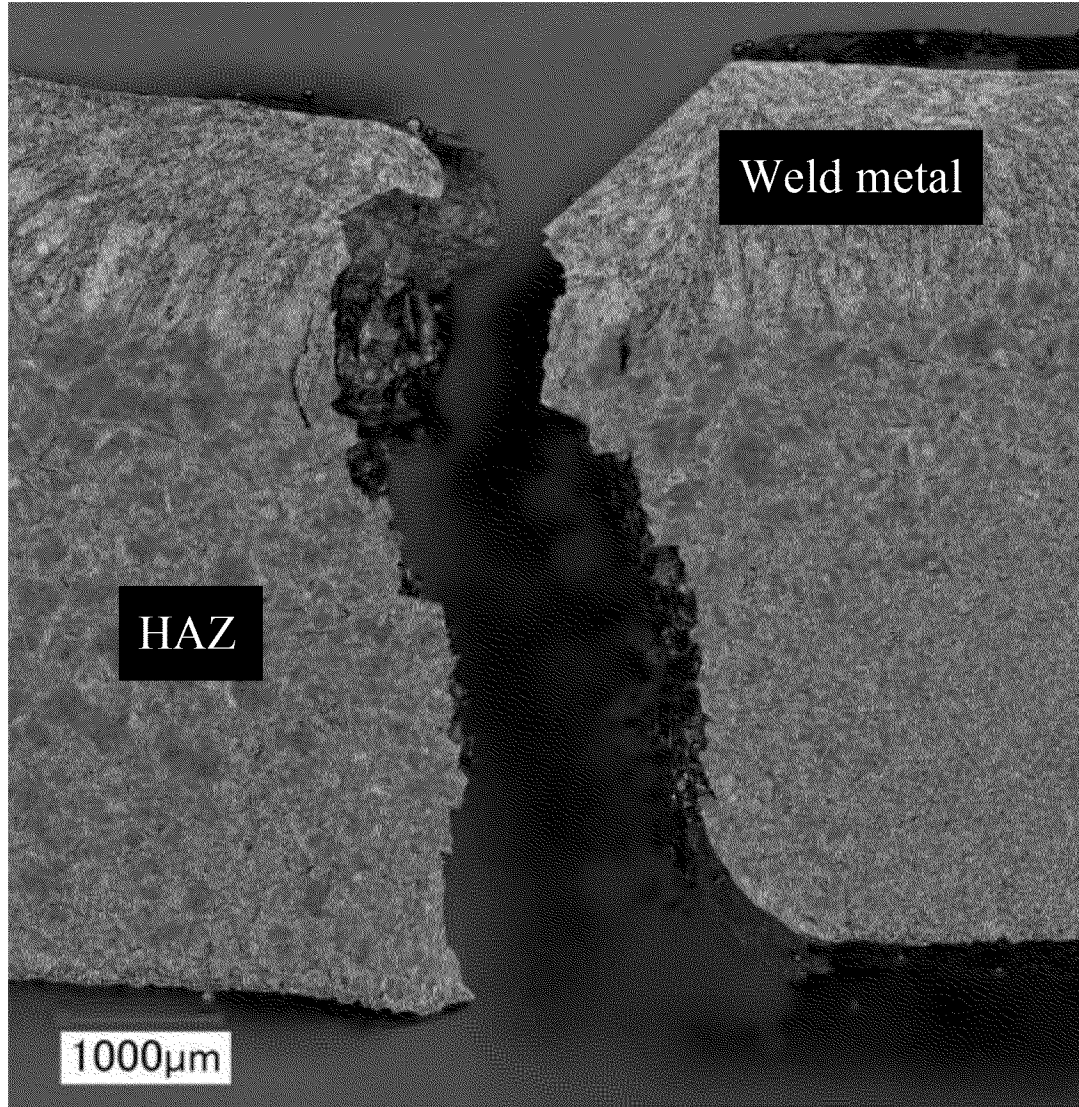
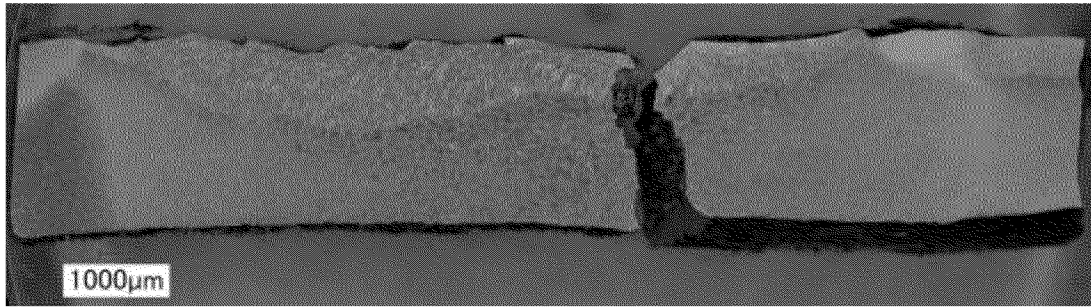


Figure 12. Images of Sample A-1-1-8, re-mounted following fractographic examination.

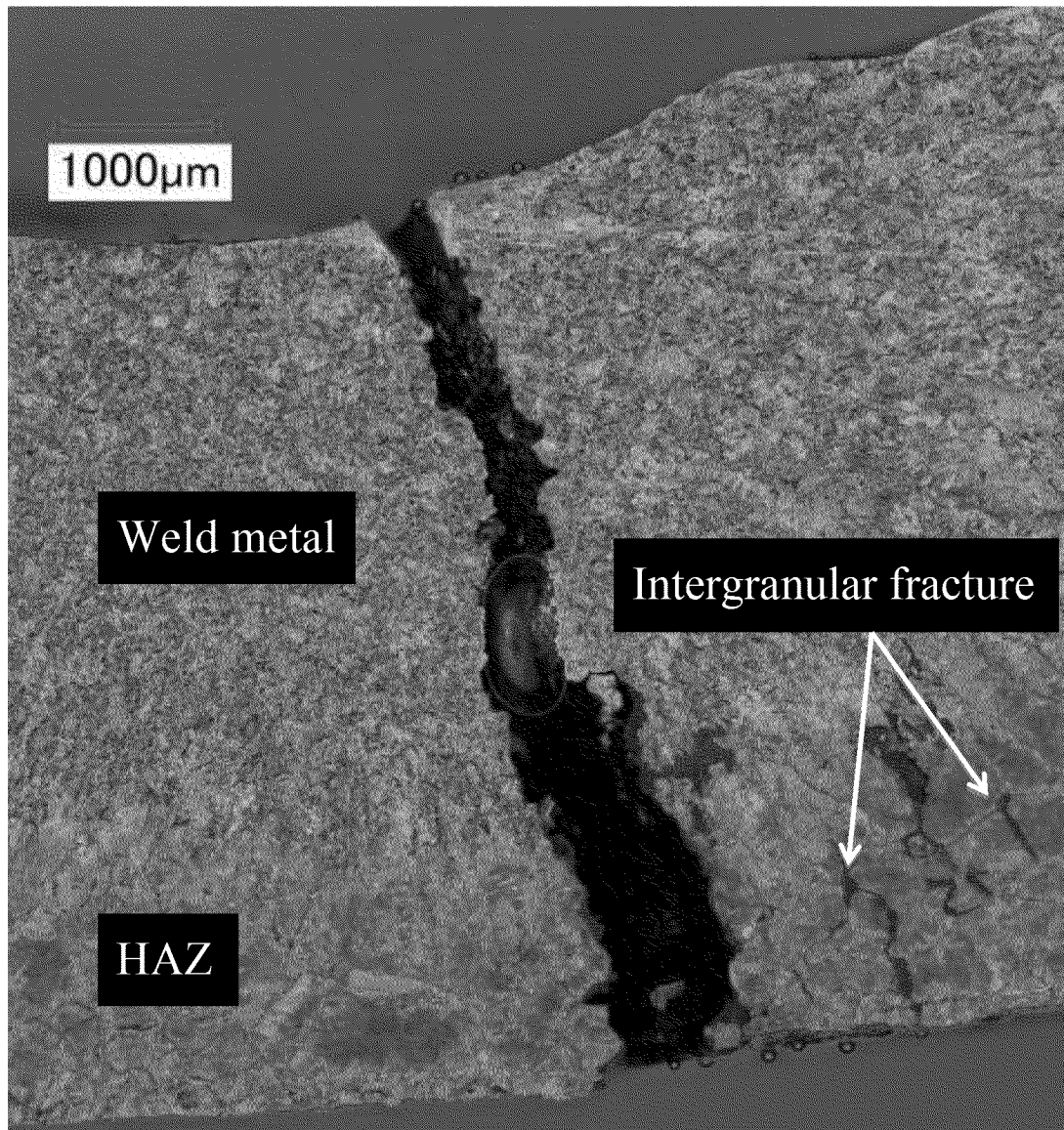
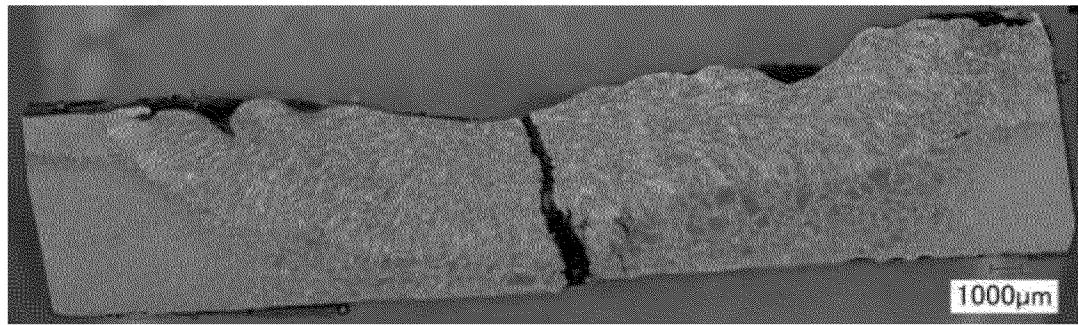


Figure 13. Images of Sample A-1-1-7, remounted following fractographic examination.

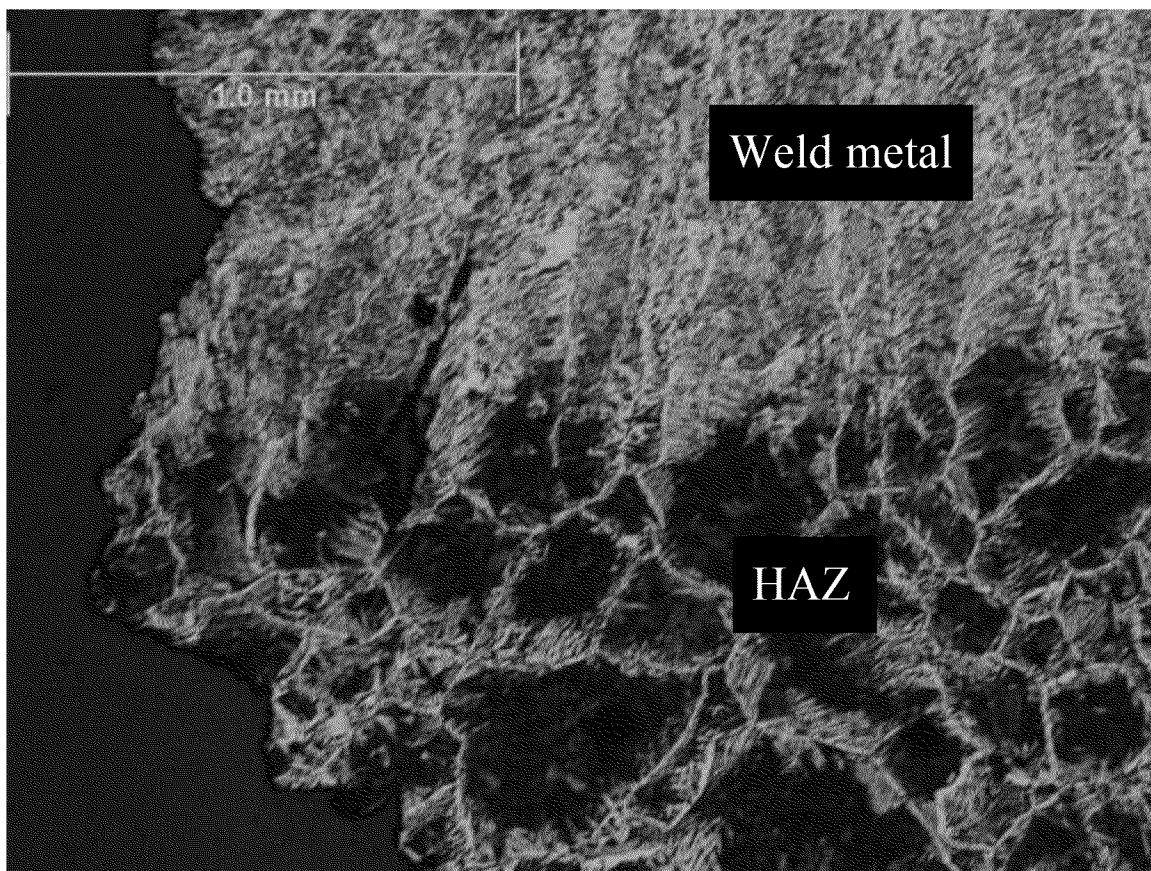


Figure 14. Metallographic image that shows significant grain coarsening beneath the weld in Sample A-1-1-8, with Widmanstatten ferrite at the prior-austenite grain boundaries in the heat-affected zone (HAZ).

Anamet conducted SEM/EDS analysis of the unopened crack in a metallographic mount: originally Figure 20 in their September 6, 2013 report, shown here as Figure 15. Consistent with Exponent's analysis, Anamet determined that the crack was filled with iron oxide and contained appreciable amounts of sulfur.

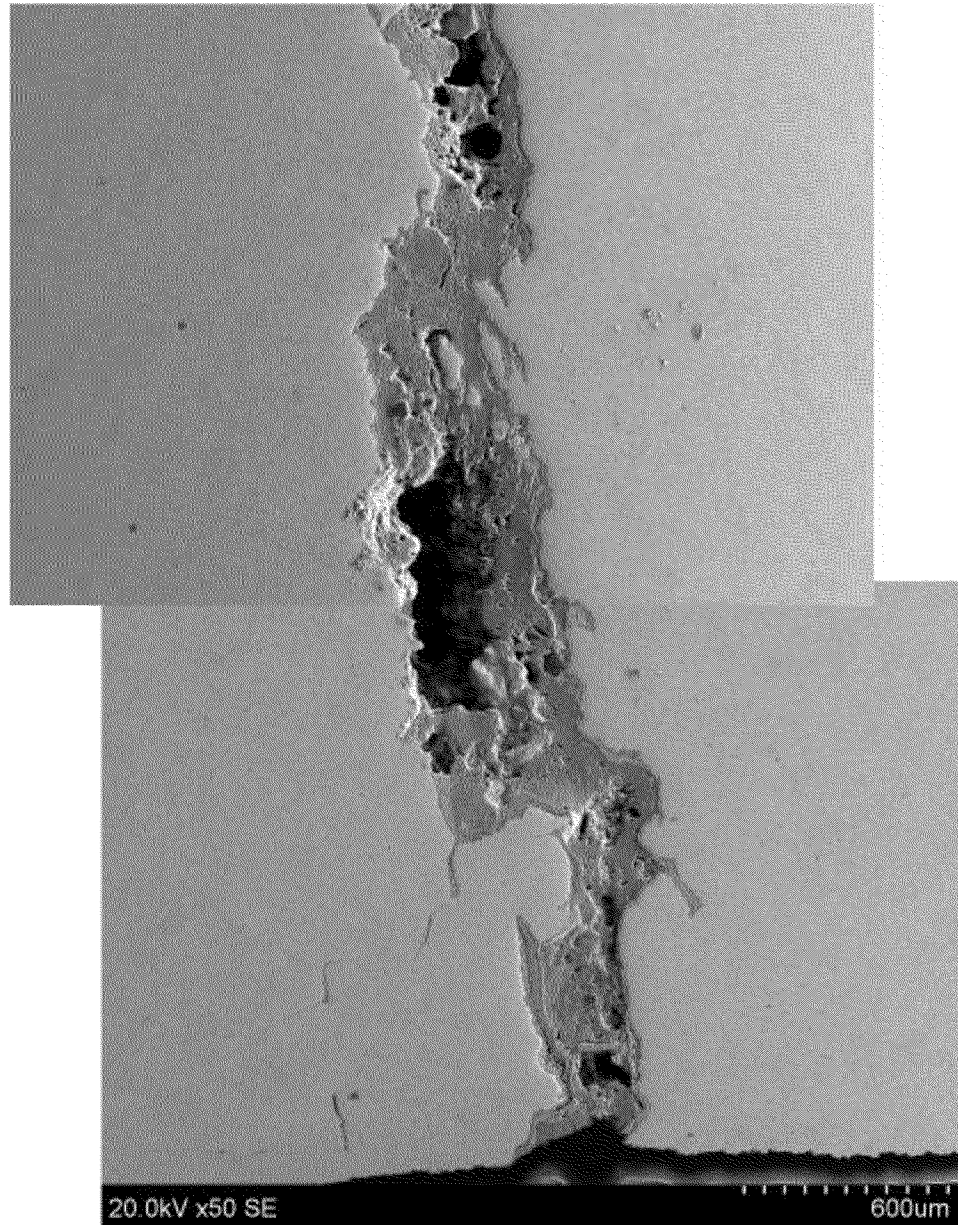


Figure 15. Composite SEM micrograph of the metallographic mount prepared by Anamet. Image reproduced from the September 6, 2013 Anamet report with permission from Anamet.

Vickers microhardness (HV) traverses were conducted over both metallographic mounts to assess hardness in the weld, HAZ, and base metal, shown by red lines in Figure 16. Each microhardness traverse and associated values are shown in Appendix B. Accounting for all testing samples, the base and weld metal exhibited average hardness values between 130-155 HV. The HAZ exhibited slightly higher hardness levels, between 155-190HV. However, it should be noted that the HAZ hardness levels are relatively low, consistent with the significant

grain coarsening observed. For carbon steels, a hardness of over 350HV would be considered excessive, and indicate a possible susceptibility to hydrogen cracking in the HAZ.^{4, 5}

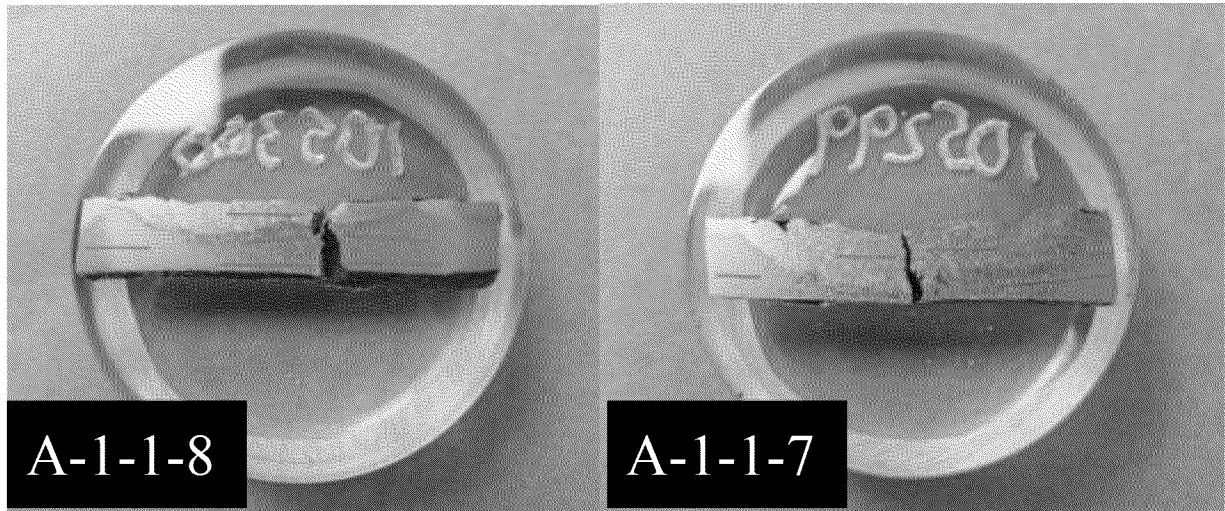


Figure 16. Metallurgical mounts of samples A-1-1-8 and A-1-1-7 made subsequent to opening the crack and examining it via optical microscopy and SEM/EDS. The red lines show where strings of microhardness testing points.

⁴ J.F. Lancaster, Metallurgy of Welding, Fourth Edition, 1987, pg. 177.

⁵ ASM Metals Handbook, Volume 6, Welding, Brazing and Soldering, pg. 648.

Chemical Analysis

Chemical analyses of the base and weld metal near the leak were performed using direct-current optical-emission spectrometry, shown in Table 1 below. The analysis indicated elemental levels consistent with typical carbon steel. Lower carbon and manganese contents were observed in the weld metal compared to the pipe material, while sulfur and silicon levels were slightly higher.

Table 1 Chemical analysis of the base and weld metal near the crack in L-147.

Element	Base Metal (wt.%)	Weld metal (wt.%)
Fe	Matrix	Matrix
C	0.21	0.15
Mn	0.42	0.33
Cu	0.04	0.03
S	0.02	0.03
P	0.02	0.02
Cr	0.01	0.02
Ni	0.01	0.01
Mo	<0.005	<0.005
V	<0.005	<0.005
B	<0.005	<0.005
Si	<0.005	0.04

The carbon equivalents of the pipe base and weld metal were calculated using the equation:⁶

$$C_{equiv} = C + \frac{Mn}{6} + \frac{(Cr + Mo + V)}{5} + \frac{(Cu + Ni)}{15}$$

Carbon equivalent is an indicator as to the hardenability of the steel and the propensity for hydrogen-induced cracking. Based on this formula, the carbon equivalent of the base metal was 0.29, while the carbon equivalent of the weld was 0.21. Both these carbon equivalents are relatively low: carbon steels with a carbon equivalent around 0.30 will usually form a pearlite-bainite structure in the HAZ,⁷ and are not particularly susceptible to cracking from hydrogen embrittlement.

⁶ G. Krauss, Steels: Processing, Structure, and Performance, ASM International, 2005, pg. 407.

⁷ J.F. Lancaster, Metallurgy of Welding, Fourth Edition, 1987, pg. 180.

Mechanical Testing

Tensile testing of the base and seam-weld metal was performed on a section of L-147 by Anamet. The results of the testing are given below in Table 2. The base metal exhibited a slightly higher tensile strength than the seam weld, while the seam-weld metal had a slightly higher yield strength.

Table 2. Anamet's transverse tensile testing (ASTM A370-10) of base and seam-weld metal from L-147.

	Base Metal	Seam-Weld Metal
Width of Specimen (in.)	1.508	1.508
Thickness of Specimen (in.)	0.254	0.257
Area (sq. in.)	0.383	0.388
Tensile Strength (psi)	61800	58700
Yield Strength (psi)*	39300	42900
Elongation in 2.0 Gage (%)	41	11
Fracture location	-	weld
Fracture Characteristic	-	Ductile**

* Upper Yield Strength (formerly Y.P.) 0.5% E.U.L.

** Indication observed.

Discussion

Our analysis confirmed that the subject leak in Line 147 occurred at a location in the pipe body that was repaired using weld metal deposition; not associated with a girth or a longitudinal seam weld. The leak was caused by porosity and solidification cracking within the weld metal that occurred during the repair process. Further, significant grain coarsening was observed in portions of the HAZ beneath the OD repair weld, which resulted in areas of intergranular fracture and contributed to the leak. This HAZ cracking also occurred during or shortly after the weld-repair process. HAZ hardness levels were insufficient to result in hydrogen embrittlement.

The cracks associated with the subject Line 147 leak have been present since the time of the weld repair. No fractographic or metallographic evidence of crack propagation (i.e. crack growth) during service or hydrotesting was observed.

Based on our analysis, it is clear that the cracks associated with the subject leak were present during the 2011 Line 147 hydrotest. The 8.32-hour hydrotest was conducted at a minimum of 600 psig, with a half-hour pressure “spike” to a maximum line pressure of 748 psig. No evidence of ductile tearing from the hydrotest was observed on the leak fracture surface. Ductile tearing can result in growth of large anomalies in pipelines during hydrotesting: known as the “pressure reversal” phenomenon. Given that the cracks associated with the leak were relatively short in axial length (less than approximately ½-inch), and relatively blunt (as observed in Anamet metallographic images), the 748-psig hydrotest pressures were insufficient to result in ductile tearing.

The subject leak was not detected during the 2011 hydrotesting. The Code of Federal Regulations Title 49, Part §192.505 indicates that a hydrotest is a strength test for pipelines to be operated at pressures that result in hoop stresses above 30% SMYS. The hydrotest conducted by PG&E on Line 147 was conducted at a minimum of 1.5 times the pipe MAOP, consistent with the federal regulations for a Class 3 location. The eight-hour portion of the hydrotest is intended to catch large-scale leaks. However, small-scale leaks can escape detection; particularly over a long test duration with large temperature changes throughout the day. The subject leak path was small, full of oxide, and provided a tortuous path for liquid water to escape.

Conclusions

- The subject leak discovered in PG&E Line 147 occurred in a weld repair of the pipe body; not associated with either a longitudinal seam or girth weld.
- The cracks associated with the subject leak occurred during the weld repair. Solidification cracking was observed within the weld deposit, while excessive grain growth, associated with high heat input, resulted in decreased toughness and local areas of intergranular fracture within the weld heat-affected zone.
- No evidence of progressive crack growth during service was observed at the leak site. Thus, the subject leak did not grow during service.
- The cracks associated with the subject leak were present during the October 2011 hydrotest. However, the hydrotest did not result in any ductile tearing or crack extension (pressure reversal) at the leak site.
- The leak path was small, full of oxide, and provided a tortuous path that limited the amount of water that could escape during hydrotesting.

Limitations

At the request of PG&E, Exponent has conducted an investigation of a crack that was present in Line-147 and how this was not detected by hydrotesting. Exponent examined the remaining material of the crack (some was destroyed during examination by Anamet Inc.) via optical microscopy and scanning electron microscopy with energy dispersive x-ray spectroscopy. The scope of services performed during this investigation may not adequately address the needs of other users of this report, and any re-use of this report or its findings, conclusions, or recommendations presented herein is at the sole risk of the user. The opinions and comments formulated during this assessment are based on observations and information available at the time of the investigation. No guarantee or warranty as to future life or performance of any reviewed condition is expressed or implied.

The findings presented herein are made to a reasonable degree of engineering certainty. We have made every effort to accurately and completely investigate all areas of concern identified during our investigation. If new data becomes available or there are perceived omissions or misstatements in this report regarding any aspect of those conditions, we ask that they be brought to our attention as soon as possible so that we have the opportunity to fully address them.

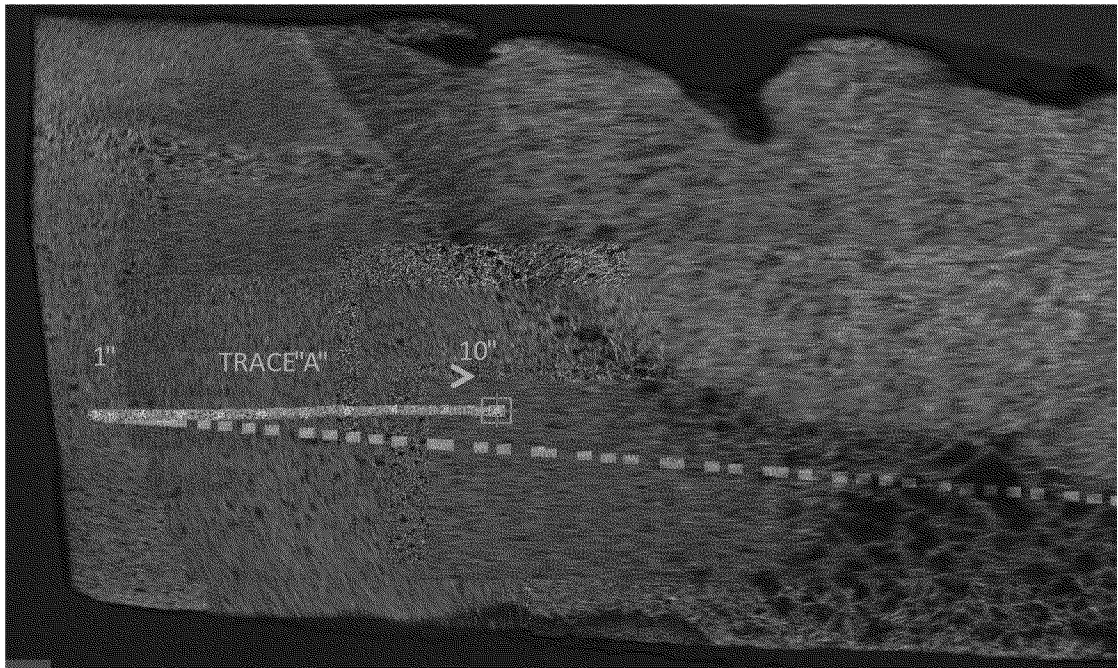
Appendix A

Microhardness Testing

Job Number	Item Number	Comments	Operator
1306838	105299	Kevin Moore	C. Jewett

500 gm

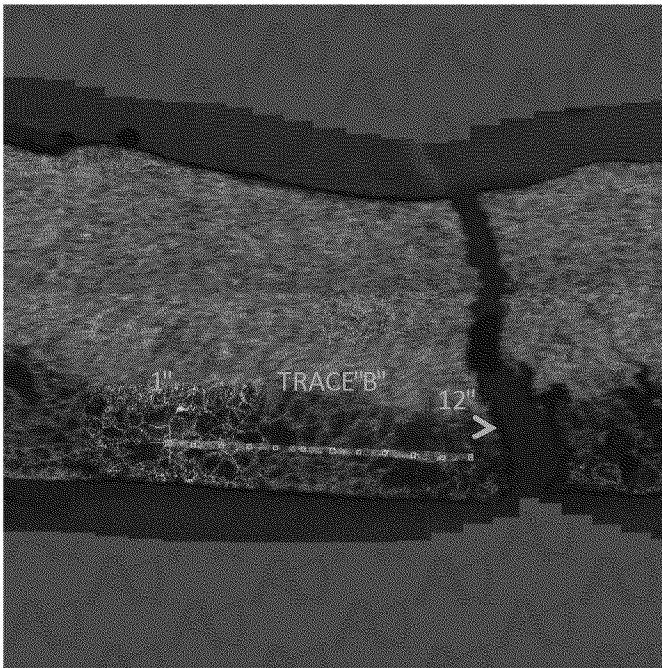
Trace A Loc	Mean Length	Hardness (HV)
1	78.8	149
2	79.3	147
3	80.1	145
4	78.1	152
5	79.4	147
6	82.7	135
7	83.1	134
8	79.5	147
9	78.8	149
10	83.1	134
	Avg:	144
	Max:	152
	Min:	134



Job Number	Item Number	Comments	Operator
1306838	105299	Kevin Moore	C. Jewett

500 gm

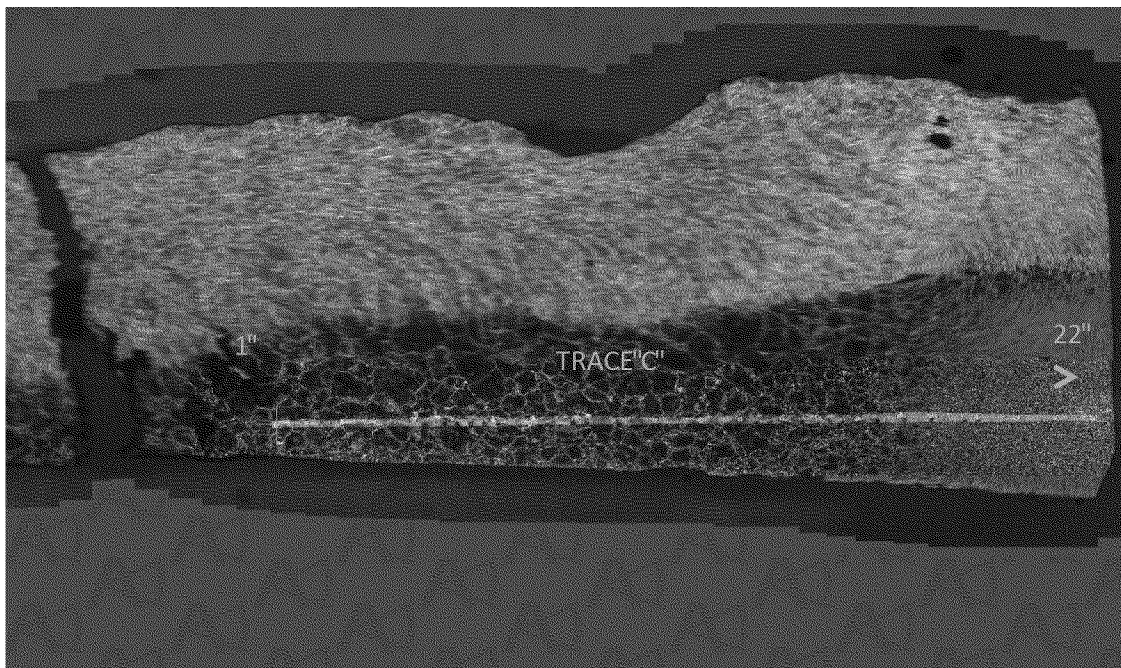
Trace B Loc	Mean Length	Hardness (HV)
1	73.1	173
2	73.4	172
3	77.2	156
4	77.9	153
5	72.8	175
6	76.4	159
7	78.7	150
8	70.5	187
9	79.2	148
10	76.6	158
11	75.9	161
12	82.2	137
	Avg:	161
	Max:	187
	Min:	137



Job Number	Item Number	Comments	Operator
1306838	105299	Kevin Moore	C. Jewett

500 gm

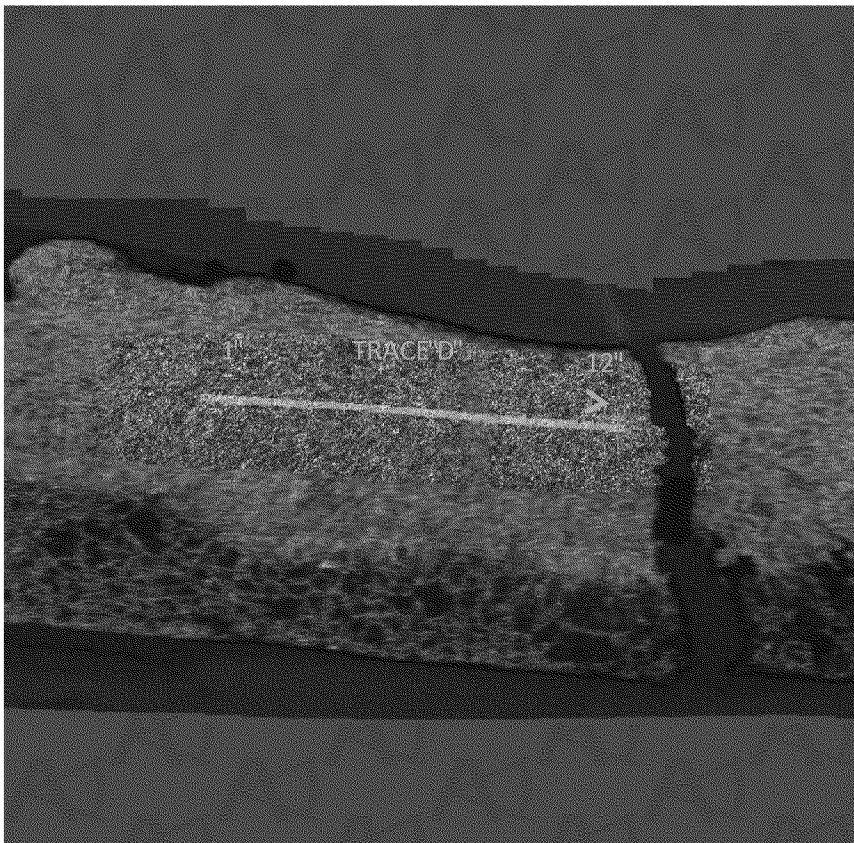
Trace C Loc	Mean Length	Hardness (HV)
1	69.3	193
2	72.1	178
3	78	152
4	77.1	156
5	73.3	173
6	72.7	175
7	78.6	150
8	69.6	191
9	75.6	162
10	72	179
11	72.6	176
12	75.6	162
13	71.3	183
14	75	165
15	68.4	198
16	74.8	166
17	82.1	137
18	80.9	142
19	80.3	144
20	78.3	151
21	78.5	150
22	80	145
	Avg:	165
	Max:	198
	Min:	137



Job Number	Item Number	Comments	Operator
1306838	105299	Kevin Moore	C. Jewett

500 gm

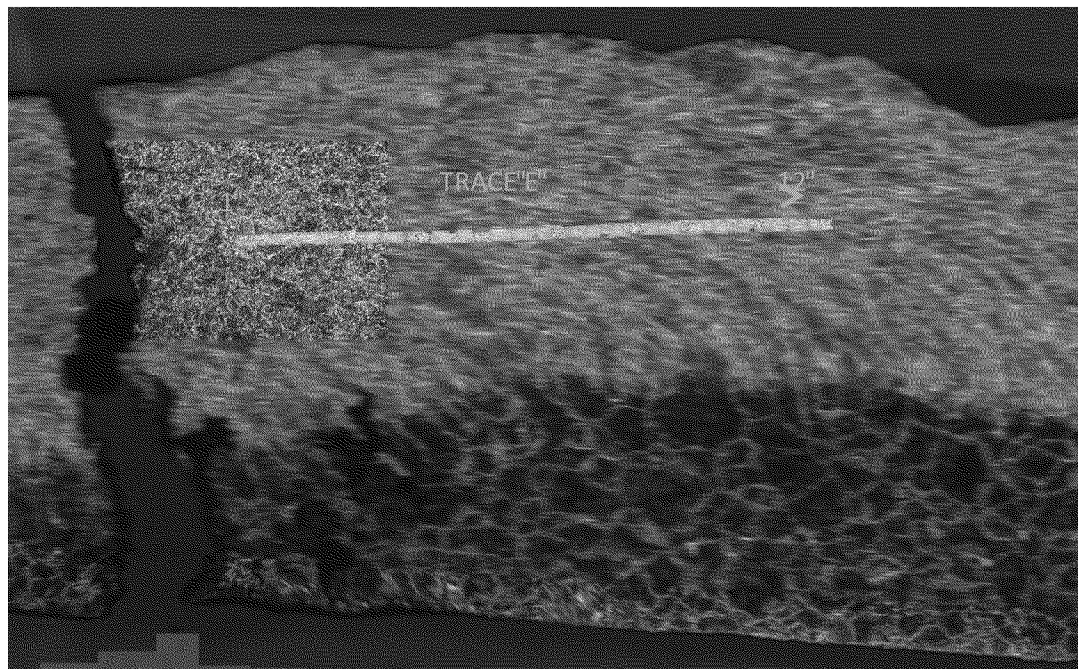
Mean Length	Mean Length	Hardness (HV)
1	83.4	133
2	76.9	157
3	78.8	149
4	80.6	143
5	79.0	149
6	78.5	151
7	79.6	146
8	79.1	148
9	79.9	145
10	80.1	145
11	77.8	153
12	78.4	151
	Avg:	148
	Max:	157
	Min:	133



Job Number	Item Number	Comments	Operator
1306838	105299	Kevin Moore	C. Jewett

500 gm

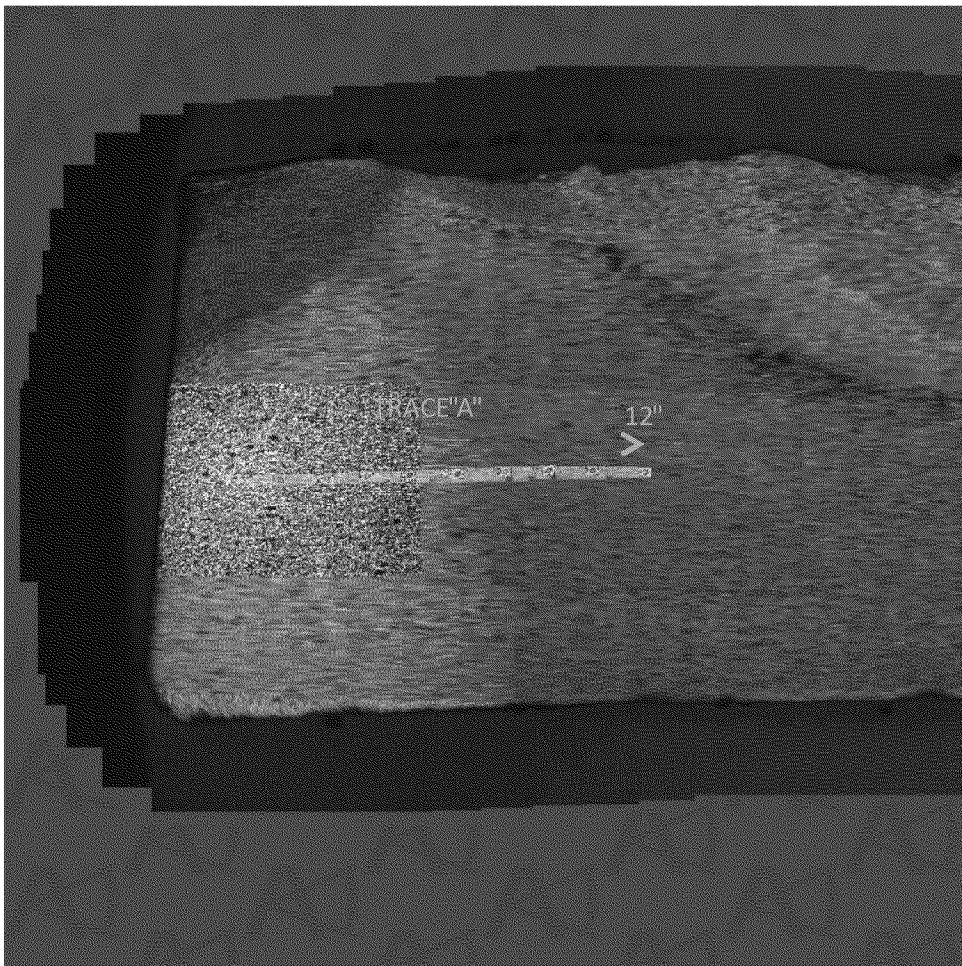
Mean Length	Mean Length	Hardness (HV)
1	77.5	154
2	77.3	155
3	80.7	142
4	79.8	146
5	79.3	147
6	84.5	130
7	77.7	153
8	79.8	146
9	79.3	147
10	82.5	136
	Avg:	146
	Max:	155
	Min:	130



Job Number	Item Number	Comments	Operator
1306838	105300	Kevin Moore	C. Jewett

500 gm

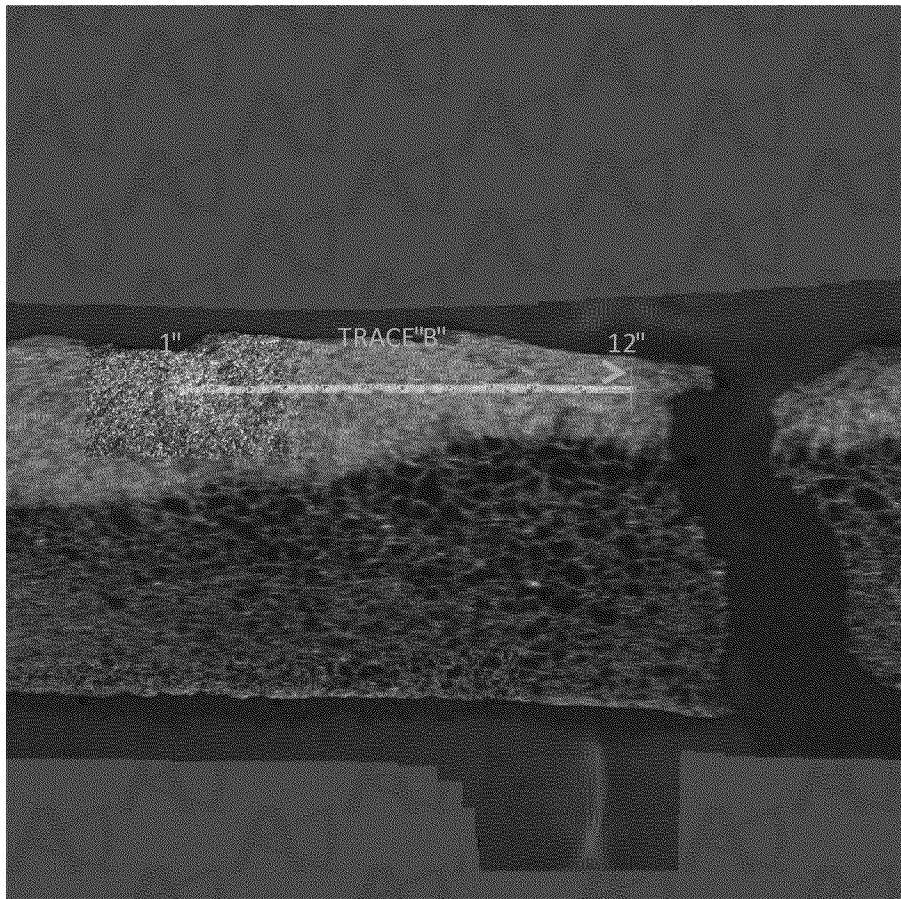
Trace A Loc	Mean Length	Hardness (HV)
1	81.3	140
2	82.9	135
3	85.1	128
4	80.0	145
5	78.2	151
6	81.6	139
7	79.3	147
8	79.0	149
9	80.2	144
10	77.3	155
	Avg:	143
	Max:	155
	Min:	128



Job Number	Item Number	Comments	Operator
1306838	105300	Kevin Moore	C. Jewett

500 gm

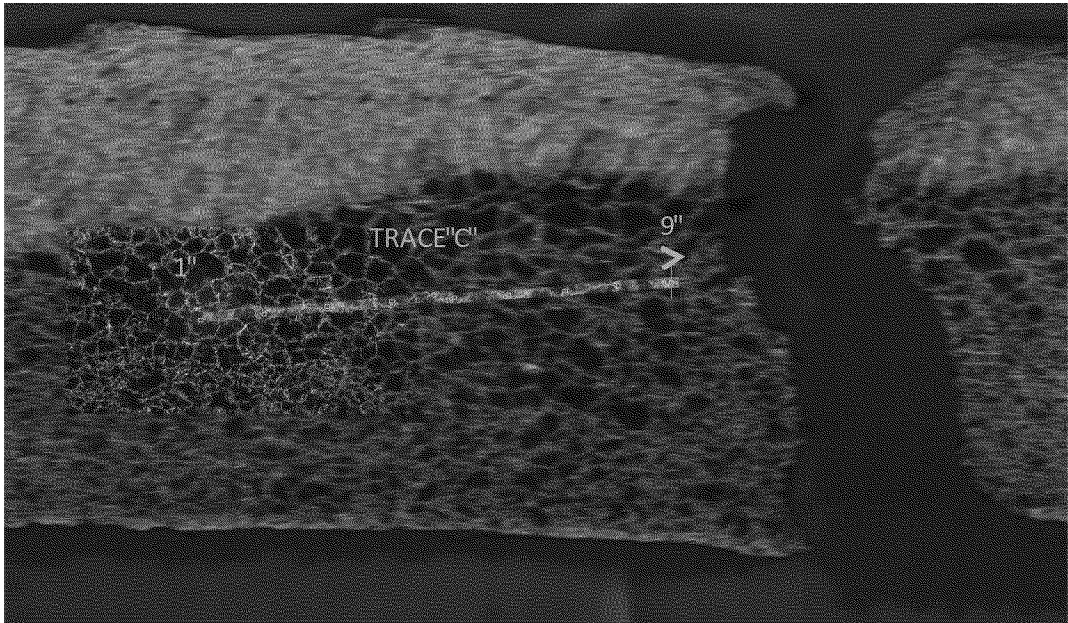
Trace B Loc	Mean Length	Hardness (HV)
1	76.9	157
2	79.2	148
3	79.7	146
4	79.6	146
5	80.1	144
6	79.4	147
7	79.0	149
8	78.2	152
9	79.3	148
10	77.3	155
11	79.6	146
12	69.8	190
	Avg:	152
	Max:	190
	Min:	144



Job Number	Item Number	Comments	Operator
1306838	105300	Kevin Moore	C. Jewett

500 gm

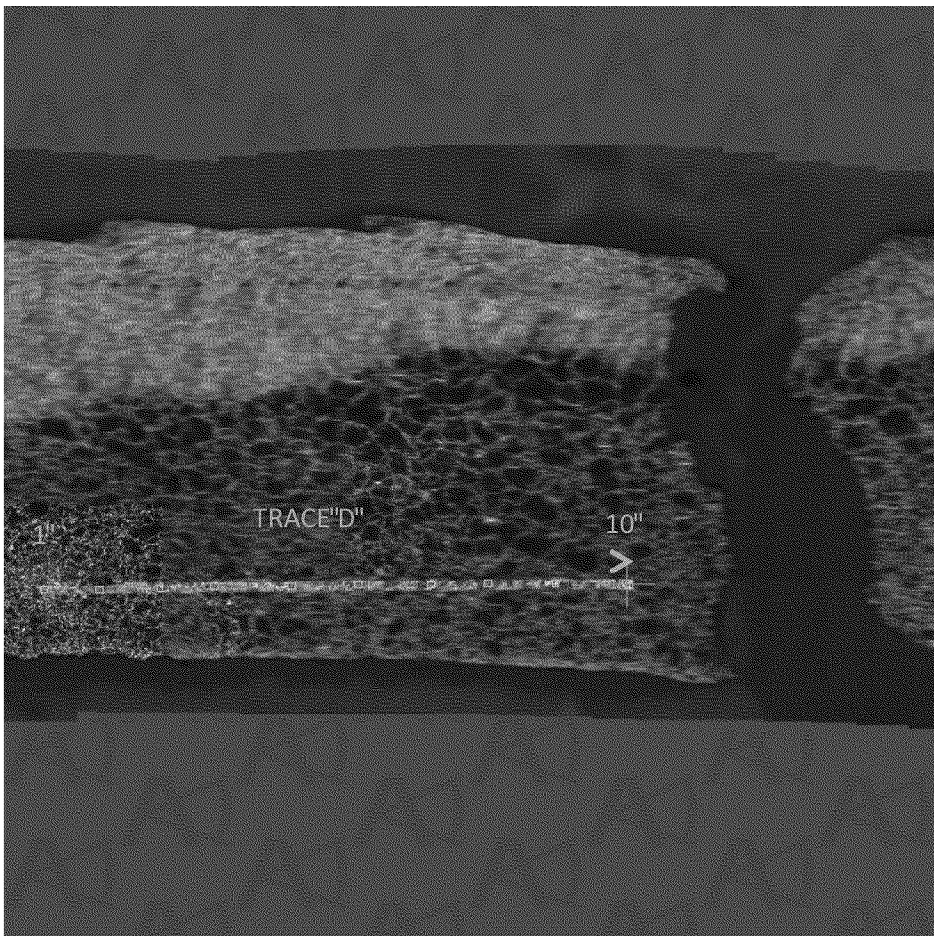
Trace C Loc	Mean Length	Hardness (HV)
1	70.1	189
2	71.2	183
3	73.5	171
4	70.4	187
5	75.8	161
6	75.2	164
7	72.4	177
8	73.1	173
9	71.8	180
Avg:	Avg:	176
Max:	Max:	189
Min:	Min:	161



Job Number	Item Number	Comments	Operator
1306838	105300	Kevin Moore	C. Jewett

500 gm

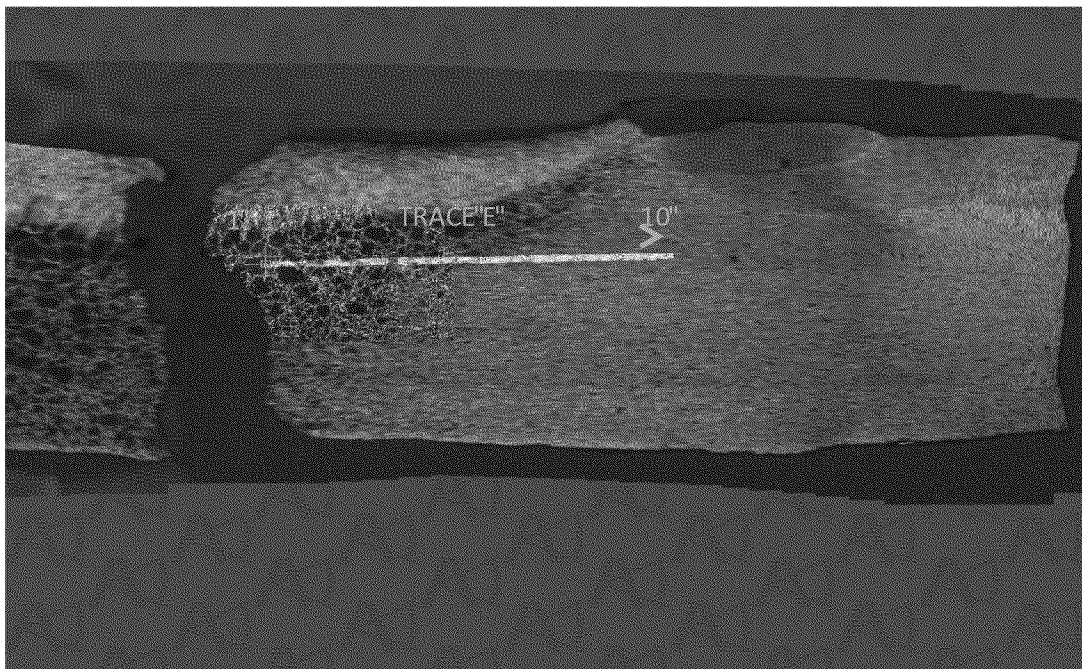
Trace D Loc	Mean Length	Hardness (HV)
1	78.0	152
2	75.0	165
3	75.9	161
4	76.9	157
5	77.8	153
6	78.0	152
7	74.7	166
8	75.4	163
9	76.2	160
10	76.5	158
	Avg:	159
	Max:	166
	Min:	152



Job Number	Item Number	Comments	Operator
1306838	105300	Kevin Moore	C. Jewett

500 gm

Trace E Loc	Mean Length	Hardness (HV)
1	76.8	157
2	76.4	159
3	80.1	145
4	79.0	149
5	78.2	152
6	82.3	137
7	83.1	134
8	85.4	127
9	84.5	130
10	83.4	133
	Avg:	142
	Max:	159
	Min:	127



Job Number	Item Number	Comments	Operator
1306838	105300	Kevin Moore	C. Jewett

500 gm

Trace F Loc	Mean Length	Hardness (HV)
1	70.9	184
2	75.3	164
3	74.6	167
4	75.6	162
5	74.9	165
6	80.1	144
7	81.8	139
8	81.8	139
9	82.7	136
10	84.3	130
	Avg:	153
	Max:	184
	Min:	130

