



Gas Information Bulletin

Title: Pipelines with Elevated 3rd Party Threats

Check all appropriate boxes

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<input type="checkbox"/> RECOMMENDED ACTIONS		<input type="checkbox"/> OPERATIONS	<input type="checkbox"/> SUBSTATION ENGR.
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Purpose

The purpose of this Gas Information Bulletin is to ensure a consistent process will be used for identifying, assessing, and documenting actions taken on pipeline locations identified with elevated third party threat. Paragraph 192.327 of 49CFR Part 192 establishes the minimum pipeline cover for new installations.

Note: There are no Federal Pipeline Safety Regulation requirements for maintaining pipeline cover.

Scope

This communication is intended to clarify appropriate processes to be followed whenever PG&E employees identify existing or active conditions that may elevate the threat to pipeline facilities due to potential third party damage. This policy applies to **ALL** pipelines and pipeline facilities owned by California Gas Transmission (CGT). This bulletin shall not change any existing standards or guidelines. This policy was developed by a cross functional team of GSM&TS employees.

Definitions of Elevated Threat Criteria

A pipeline is defined as having an elevated third party threat whenever one or more of the following criteria exist. The process for each of the three criteria is described in the "Required Actions" section:

1. Operations personnel discover a condition that they determine requires prompt assessment or the pipeline depth of cover is 13 inches or less.
2. The pipeline depth of cover is less than or equal to 24 inches and greater than 13 inches.
3. The pipeline depth of cover is less than 36 inches and greater than 24 inches.

The *Pipeline Risk Management Report*, located within the DGSAVE program, will be utilized to initiate and document actions at locations of concern. This report enables the Local Transmission Superintendents (LTS), District Superintendents (DS) and Pipeline Engineer (PLE) to inform the Risk Management Team (RMT) whenever a newly discovered pipeline condition exists such as ground movement, observed erosion, or shallow cover, which may increase the risk to the pipeline and make the pipeline vulnerable.

- Note:**
1. If an unsafe condition exists, operations employees should take immediate action to ensure the location and pipeline is safe until permanent repairs are complete. (For instance; use barricades, signage, etc.)
 2. Whenever a pipeline is exposed by physical excavation, regardless of the depth of the pipe, a "*Leak Survey, Repair, Inspection and Gas Quarterly Incident Report*," also known as an "A-Form", should be completed per UO Standard S4110, *Leak Survey and Repair of*

Gas Transmission and Distribution Facilities. Send the completed "A-Form" to the CGT GSM&TS Mapping department for GIS entry.

REQUIRED ACTIONS

Criteria 1: “Operations employees requests prompt assessment” or “Cover is 13 inches or less.”

Operations Employees

Within 3 days of identifying a condition requiring prompt assessment (regardless of depth), or determining cover is 13 inches or less through physical excavation, probing, or electronic depth measurements (verified by probing where possible):

1. The operations group discovering the condition shall note the following information:
 - Pipeline Number and Mile Point (MP)
 - GPS coordinates or distance from identifiable location, such as the center line of a street
 - Existence of any High Consequence structures (schools, parks, hospitals, etc.) less than 100 feet in proximity to the pipeline
 - Depth of cover to top of pipe verified by excavation, hand probing, or electronic depth measurement (specify if the accuracy has been verified by probing at that location or another location in the same proximity)
 - Other concerns such as wheel loading, deep ripping, or USA violations
 - Digital photographs of the site are highly recommended
2. If district employees identify the concern, the District Superintendent shall utilize the *“Pipeline Risk Management Report,”* located within the DGSAVE program, to request analysis by the Risk Management Team, who will immediately forward the report to the appropriate PLE for engineering evaluation and corrective action.
3. If division employees identify the concern, the T&D Supervisor shall utilize the Work Management program to initiate a Work Request to the Local Transmission Superintendent (LTS). The LTS shall review the request and forward it to the PLE and Risk Management Team. The PLE will input the information into DGSAVE.

Pipeline Engineer (PLE)

Within 10 days of receipt of the notification the PLE will:

1. Review the location, and determine if additional safety measures are required. Evaluations could include P-Stress calculation, risk calculations, land activity, easement rights and site visit. Protection measures may include recommendation for additional property owner notification, signage, lowering, mechanical protection, or other engineered solutions. The PLE will work with the local DS and/or LTS to determine the appropriate protection measure(s) and corrective action plan. If no additional protection measures are deemed necessary, this information will be provided to the originator and forwarded to the Risk Management department to file.
2. The PLE’s calculations and recommendations will be published and stored in the shared drive, in the following folder: <T:\ENG\LIBRARY\Risk Mgmt Reports\Pipeline Risks>.

Risk Management Team (RMT)

Within 20 days of the receipt of the notification, the RMT will:

1. Determine the property owner and send out a Property Owner Notification letter. This letter is electronically documented in the Public Safety Information Program (PSIP) Property Owner

Notification database. Once the property is selected for notification, it will automatically be placed in the bi-annual property owner notification program.

2. If requested by a PLE, an e-mail describing various risk reduction alternatives with corresponding risk ratings will be sent from the RMT to the originator of the "*Pipeline Risk Management Report*" and PLE. The Risk Mgmt Team will document all correspondence by saving the e-mails in the shared drive, in the following folder: <T:\ENG\LIBRARY\Risk Mgmt Reports\Pipeline Risks>. In addition, if a project is required to address the concern, the Risk Mgmt Team will document the PSRS record number in the Risk Management Report file.
3. The "*Pipeline Risk Management Report*" shall be forwarded to Mapping and the relevant data entered as an "A-Form" in the GIS program.

Criteria 2 – "Pipeline depth of cover is less than 24 inches and greater than 13 inches."

Operations Employees

Within 3 days of identifying a depth of cover less than 24 inches but greater than or equal to 13 inches through physical excavation, probing, or electronic depth measurements (verified by probing where possible):

1. The group discovering the condition shall note the following information:
 - Pipeline Number and Mile Point (MP)
 - GPS coordinates or distance from identifiable location, such as the center line of a street
 - Existence of any High Consequence structures (schools, parks, hospitals, etc.) less than 100 feet in proximity to the pipeline
 - Depth of cover to top of pipe verified by excavation, hand probing, or electronic depth measurement (specify if the accuracy has been verified by probing at that location or another location in the same proximity).
 - Other concerns such as wheel loading, deep ripping, or USA violations
 - Digital photographs of the site are highly recommended
2. If district employees identify the concern, the District Superintendent shall utilize the "*Pipeline Risk Management Report*", located within the DGSAVE program, to request analysis by the Risk Management Team.
3. If division employees identify the concern, the T&D Supervisor shall utilize the Work Management program to initiate a Work Request to the Local Transmission Superintendent (LTS). The LTS shall review the request and forward it to the PLE. The PLE will input the information into DGSAVE.

Note: If a condition exists that requires prompt assessment use Criteria # 1.

Risk Management Team (RMT)

Within 30 days of the receipt of the notification, the RMT will:

1. Determine the property owner and send out a Property Owner Notification letter. This letter is electronically documented in the Public Safety Information Program (PSIP) Property Owner Notification database. Once the property is selected for notification, it will automatically be placed in the bi-annual property owner notification program.

2. Perform Risk Calculations and evaluate possible risk reductions for different potential mitigations for the location. The RMT will then forward all information pertaining to the elevated threat to the appropriate PLE for consideration.
3. An e-mail describing various risk reduction alternatives with the corresponding risk ratings will be sent from the RMT to the originator of the "*Pipeline Risk Management Report*" and the PLE. The Risk Mgmt Team will document all correspondence by saving the e-mails in the shared drive, in the following folder: <T:\ENG\LIBRARY\Risk Mgmt Reports\Pipeline Risks>. In addition, if a project is required to address the concern, the Risk Mgmt Team will document the PSRS record number in the Integrity Mgmt Scheduling database.
4. The "*Pipeline Risk Management Report*" shall be forwarded to CGT GSM&TS Mapping and the relevant data entered as an "A-Form" in GIS.

Pipeline Engineer (PLE)

Within 45 days of receipt of the original notification the PLE will:

1. Review the location, and risk calculations, and determine if additional safety measures are required. Evaluations will include P-Stress calculation, land activity, and easement rights. Protection measures may include recommendation for additional property owner notification, signage, lowering, mechanical protection, or other engineered solutions. PLE will work with the local DS and LTS as needed. If no additional protection measures are deemed necessary, this information will be provided to the originator and forwarded to Risk Management to file.
2. The PLE's calculations and recommendations will be published and stored in the shared drive, in the following folder: <T:\ENG\LIBRARY\Risk Mgmt Reports\Pipeline Risks>.

Criteria 3 – "Pipeline depth of cover is less than 36 inches and greater than 24 inches."

When a pipeline's depth is determined by physical excavation to be less than 36 inches, an "A-Form" shall be completed and sent in to CGT GSM&TS Mapping. GSM&TS Mapping shall post the information in GIS within 30 days of receipt of form. If the line is not exposed, and the line is identified using probing or electronic depth measurements (by probing where possible) then the following shall be completed:

Operations Employees (for probing and electronic depth measurements only)

Within 3 days of identifying a depth of cover less than 36 inches but greater than, or equal to, 24 inches:

1. The group discovering the condition shall note the following information:
 - Pipeline Number and Mile Point (MP)
 - GPS coordinates or distance from identifiable location, such as the center line of a street
 - Existence of any High Consequence structures (schools, parks, hospitals, etc.) less than 100 feet in proximity to the pipeline.
 - Depth of cover to top of pipe is verified by hand probing, or electronic depth measurement (specify if the accuracy has been verified by probing at that location or another location in proximity)
 - Other concerns such as wheel loading, deep ripping, or USA violations

- Digital photographs of the site are highly recommended
- 2. If district employees identify the concern, the District Superintendent shall utilize the "*Pipeline Risk Management Report*", located within the DGSAVE program.
- 3. If division employees identify the concern, the T&D Supervisor shall utilize the Work Management program to initiate a Work Request to the Local Transmission Superintendent (LTS). The LTS shall review the request and forward it to the PLE. The PLE will input the information into DGSAVE. PLE will forward the information to mapping to be entered in GIS.

Note: If a condition exists that requires prompt assessment use Criteria # 1.

Risk Management Team (RMT)

Annually the RMT shall query GIS to determine all parcels with new "A-Forms", or existing Pipeline Risk Management Reports, indicating cover less than 36". A Property Owner Notification letter shall be sent to all newly identified parcels. These letters shall be electronically documented in the Public Safety Information Program (PSIP) Property Owner Notification database. Once the property is selected for notification, it will automatically be placed in the bi-annual notification program.

General Training and Documentation Requirements:

1. All PLE, DS and LTS are required to have DGSAVE training and access.
2. All recommendations and mitigations outlined in this bulletin will be initiated in DGSAVE.
3. All tracking documentation will reside in the Risk Management Reports.

Approved by:

(Original signed by [REDACTED] Manager GSM&TS System Integrity)

Date: September 28, 2004

Author(s): [REDACTED] and [REDACTED]

If you have any questions about this bulletin, please call the employee(s) listed below:

Contact(s):

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Phone(s):

