# SAFETY OMBUDSMAN

Virtual Townhall Meeting Annual Report Review

Stephen F. Nowaczewski

### **Overview**

Experience/Background

Safety Ombudsman Role

Review Three Annual Reports covering July 2012-June 2022

- Work of the Safety Ombudsman
- Work of the Well and Storage Operations Safety Committee (WSOC)
- Recommendations for Improvement

## Safety Ombudsman Role

Experience/Background of Steve Nowaczewski

- Education, Experience, Professional Associations
- Risk Management and Safety
- Industry Service including API 1171 Development
- Consulting and Integrity Management Maturity Advocacy
- RCP history with SoCalGas

## Safety Ombudsman Role

#### Key Elements of Role

- Safety/Transparency Advocate
- Totally Independent of SoCalGas
- Investigate and Respond to Safety/Integrity Concerns
- Public/Regulatory Interface
- Interface with SoCalGas Aliso Canyon Safety Committee

### Work of the Safety Ombudsman

- Participate in Quarterly WSOC Meetings
- October 6, 2021 Virtual Public Meeting
  - Provided overview of 2021 Safety Ombudsman Reports find 2021 meeting presentation and related documents at: <a href="https://www.safetyombudsman.com/resources/">https://www.safetyombudsman.com/resources/</a>
- Safety Ombudsman Data Requests
  - Focus on SoCalGas SIMP/RMP, well and reservoir integrity issues, and information needed to respond to public inquiry
  - Obtain access to key information operational and programmatic to facilitate review/assessment of conditions at the Facility
  - Verify status of public agency audits and the Company responsiveness to the audit findings

### Work of the Safety Ombudsman

- CPUC and CalGEM Safety Inspections/Audits
- SoCalGas submission of updated SIMP RMP
- Methane Emission Incidents Above Threshold Levels
  - Relates to SoCalGas' Fence Line Methane Monitors
  - Website: <a href="https://sem.secmcs.com/MethaneMonitoring/">https://sem.secmcs.com/MethaneMonitoring/</a>
  - 25 ppm averaged over 30 minutes
  - No Known Events this reporting period
- Safety-related Concerns/Complaints Submitted by the Public
  - One inquiry received on October 27, 2021

### Work of the Safety Ombudsman

- Safety-related Concerns/Complaints Submitted by the Public - One question received on October 27, 2021:
  - "I am not sure if this role is still active, but if it is, can you please tell us if there is a leaking gas well at the Aliso facility right now?"
  - Response is posted as February 25, 2022 Submission #5 and can be found through this link:
  - https://www.safetyombudsman.com/public-inquiriesresponses/
  - The Ombudsman concluded that leakage of concern was not present during the period investigated; however, the Ombudsman had several recommendations to SoCalGas for procedure improvements (discussed later)

### Work of the WSOC

- Eight-Year Commitment
- Role: Safety Monitoring and Improvement Activities:
  - Quarterly Meetings
  - Focus on Well Integrity and Leak Prevention
  - Make Recommendations for Repairs/Improvements, Policies
  - Facilitate Role of and Work Cooperatively With Ombudsman
- WSOC Charter and Meetings
  - Recommendations for Improvements
  - Periodic Safety Audits of the Facility completed audit of one standard and planning additional audits in future cycle
- CPUC and CalGEM Safety Inspections
  - Reassessment period extensions for certain wells

#### No additional WSOC recommendations for Safety Improvements

 New subcommittee formed at the June 2022 quarterly meeting to recommend procedure audits – will be developed in the next 12 months

#### Ombudsman Recommendations for Safety Improvements at the Facility

- Part A: Four New Recommendations During the July 2021 June 2022 Period
- Part B: Report on SoCalGas Progress in Responding to Recommendations Made in Prior Periods
  - B-1: recommendations made by the WSOC, closed
  - B-2: recommendations made by the Safety Ombudsman, closed
  - B-3: recommendations made by the Safety Ombudsman, open

#### Safety Ombudsman Recommendations

- 32 suggested improvements to SoCalGas RMP SIMP chapters and procedures
  - Develop a plan for baseline reservoir integrity risk assessment, which is required by PHMSA prior to March 13, 2024.
- Revise the applicable pressure monitoring procedural standard to include
  - Clarify roles and responsibilities for trend monitoring, internal reporting, and investigation
  - Trend monitoring and analysis, frequency of monitoring and review of monitoring practices, and requirements for more frequent monitoring when anomalous readings are observed
  - Methods to identify deviations from normally expected readings and relation to normal/abnormal thresholds and warning levels
  - Integration of pressure and methane monitoring in well integrity review

#### Safety Ombudsman Recommendations

- Promote trust by increasing transparency of and performance metrics related to:
  - Procedural robustness, adequacy, and continual improvement;
  - Demonstrating risk management effectiveness through metrics regarding risk management activities; risk reduction related to prevention, mitigation, knowledge gap closure, or other aspects of risk; risk-informed decisions implemented and effectiveness evaluations
  - Safety culture improvements, including those with respect to human and organizational risk management.
- Implement within the SIMP applicable recommendations from the CPUC-sponsored report by 2EC "Independent Safety Culture Assessment of SoCalGas and Sempra Energy."
- SoCalGas preliminary response to the Ombudsman recommendations can be found in the report

SAFETY OMBUDSMAN

Safety Ombudsman Compendium of All Recommendations, Status and Progress Tracker

- Two WSOC recommendations in the past, addressed and closed
- Six Ombudsman recommendations addressed and closed, with resolutions discussed in the report
- Three Ombudsman recommendations made in prior years are open and being worked by SoCalGas – their status is discussed within the report
- The Safety Ombudsman will keep track and encourage progress toward address and completion of the recommendations

### **Next Steps**

- Review feedback from virtual public meeting
  - Incorporate recommendations for improving utility of future reports
- Ongoing attendance at WSOC Meetings
- Responding to issues/concerns posted to Safety
  Ombudsman Website the link is on the next slide...



# Questions?

https://safetyombudsman.com/ Ombudsman@SafetyOmbudsman.com