

Castroville Timeline from Texas Regulatory Consultants
City of Castroville Gas System

October 2024

Answered 6 emails and 4 Phone calls to address the information we needed to get started. System Mapping.

Oct 22, 2024 Travel to San Antonio to assist Simon Pena with transfer of records from (CPS) to Simon for the City of Castroville.

November 2024

Answered 5 emails with Simon Pena regarding Records, O & M manual and weekly meetings.

Answered 5 emails with Ricky regarding quarterly Checks and services, employee to train, New installs and get a contractor for hit lines and emergency call out.

Nov 1, 2024 Travel to Castroville for meeting with Simon Pena, Kathy and Ricky to transfer records needed to complete quarterly checks and services.

- Discuss the need for all the Manuals (already working O&M) and the information we would need to complete the others.

Nov 2, 2024 Simon email DIMP and sent information to start work on the DIMP Program. This manual is currently in the works.

Nov 4, 2024 Started working on Draft O&M for City of Castroville.

Nov 8, 2024 Travel to Castroville – “Gas Training” and meeting with Kathy and Ricky to get access to records, information needed for quarterly checks and services.

Nov 8, 2024 Delivered copies of 10 Forms (Records) example of forms the Gas Dept may want to use going forward to document checks, services, Leaks, install and other task.

Nov 11 to 14, 2024 **Quarterly checks and services**

1. Odor Test & odorant level check
2. Patrol of Business District
3. Patrol Points 1 thru 5
4. Patrol of Residential Areas
5. Atmospheric Corrosion checks (Survey)
6. Review cathodic Protection (CP Reading – 12 open work orders)
7. 3 Year Leak Survey
8. Annual Business District Leak Survey
9. Training
 - a. Isaac Sandriez – Malodorant (odorant)
 - b. Isaac Sandriez -- Patrolling

Nov 15, 2024 Assist Ricky Carrasco getting contractor for gas line install at the following locations;
124 Allen Ave., gas service line install

Nov 19, 2024 Assist Ricky Carrasco with drafting forms for document of leaks, repairs and a leak logs to track all leaks

Nov 19, 2024 Assist Ricky Carrasco with getting contractor for gas line install at the following address;
❖ 224 Allen Ave. New gas service line install

Nov 20, 2024 Travel to Castroville for meeting with JT Williams (CPS ENERGY) and Rodney to change out locks at City Gate, Regulator Station and Rectifier sites.

Nov 27, 2024 • Delivered City of Castroville New Operations and Maintenance Manual.
Drafted and emailed Ricky Carrasco documentation of all reports for 4th quarterly checks and services.

December 2024

Dec 2, 2024 Emailed Simon Pena for information on City last DIMP (Working DIMP)

Dec 2, 2024 Started working Draft on Operator Qualification Manual.

Dec 4, 2024 Assist Kathy with getting contractor for gas line install at the following address;

Here are the addresses needing service work:

- 224 Allen – new house build that is ready for gas. There should be a gas stub out on the property already. This one is **URGENT** and we are talking to another contractor trying to get someone to do this ASAP.
- 1301 Washington – remove gas service that is located under the electric meter
- 133 Emil – new house build located in same subdivision as 224 Allen and also has the service stub-out already; not as urgent.

Dec 11, 2024 Emailed Kathy and Simon – assisted with questions about drug and alcohol.

1. Started Drug and Alcohol Manual.
2. Helped with information package for testing (DOT)
3. Made recommendations for Program

Dec 13, 2024 Emailed Ricky with information on Cathodic Protections and answered question to Simon Pena email about if we were aware of the number of bad Anodes in the system and what we are doing about it. (12 open work orders)

We (TRC) are one step ahead of him and working hard to make you look good, here is what you should report to him.

1. TRC has scheduled CP reading to be conducted during the second quarter around (April-May 2025)
2. TRC knows of the bad anodes and already order 25 anodes of various sizes (Currently on hand – 25 1-lb anodes, 25- 2-lbs Anodes, 10 5-lbs Anodes and 10 10-lbs Anodes).
3. TRC has scheduled Casing to be inspected during the 3rd quarter.
4. Rectifiers, (due to OQ, No one at TRC is currently OQ for rectifiers) TRC has hired a contractor (Chapman Engineering) to conduct the rectifier inspection for the next year (2025). Rectifiers were last inspected on 12/13/2024.
5. Annual Patrols – TRC conducted all patrols (Inside Business District, Outside Business District, Bridges & Creek) during the Leak Survey, just as CPS has done in the past.
6. Annual Patrol (Casing vents & Pipeline Markers) was started in November, however due to the large number of markers needing update information, it was rescheduled for February 2025. TRC is ordering new stickers with updated information to cover CPS Energy information. Sticker will be available (ready for pick-up) in January 2025.

Dec 13, 2024 Travel to Castroville – Meeting with Chapman Engineering to conduct Rectifier testing and monitoring.

Dec 17, 2024 Emailed Kathy – information needed to complete DIMP. (last 5 7100 1-1)

Dec 21, 2024 OQ Manual Completed.

January 2025

Jan 3, 2025 Address an email from Ricky about training for Robert Norris.

Jan 3, 2025 Started working on Drafting the Drug and Alcohol Manual.

Jan 6, 2025 Address an email from Ricky about training for Drug and Alcohol Program.

I am assuming that Robert Norris is the new Gas Supervisor.

I would recommend he start with the two class for drug and Alcohol offered by TMC.

1. The DOT PHMSA Supervisor Reasonable Suspicion Signs and Symptoms Drug and Alcohol Training. (1-hour Training)
2. Reasonable Suspicion Training for Supervisors. (1-hour Training)

Both courses are online though TMC and will be needed during your upcoming audit.

I will get back to you on the other OQ training in the next week or so. We are scheduling our next visit in the next few weeks and would like to conduct some OQ training at the same time.

Jan 16, 2025

Address an email to Ricky about quarterly dates for quarterly checks and services.

We anticipate being on-site from **Feb 17th to the 21st, 2025.**

During our visit we will be conducting the following services listed below;

Annual Requirements;

- Emergency Responder Liaison
- Public Awareness
- Continuing Surveillance. (Line Marker & Casings)

Quarterly Requirements;

- Patrol Points – Rivers, Highways & Railroads Crossing.
- Patrol Business District.
- Odorization of gas Testing.
- Conduct Pipeline Patrolling.

Other Requirements;

- Report RRC PS-95 **Due by Jan 15, 2025**
- PHMSA Annual Report 7100 1-1 **Due by March 15, 2025**
- Loss & Unaccounted Gas **Due by March (with PHMSA 7100 1-1)**
- Distribution Facilities Replacement **Due by March 15, 2025**
- EIA U.S Energy Administration **Due by March 15, 2025**

Jan 24, 2025

Address an email From John Gomez about the PS-95 that was past due.

Jan 24, 2025

Address an email to Kathy Adams about needing access to the City RRC PiPes account to submit the PS-95.

Jan 24, 2025

Emergency Call Out – 103 River Forrest contactor damaged gas meter and it was leaking.

- Training Robert Norris on meter replacement and leak detection.
- See Leak Report 103 River Forrest.

Jan 27, 2025

Address an email From John Gomez about the Pipeline Safety Inspection Package Number:00092418/Completion Delinquent.

Jan 28, 2025

Address an email From Ronny Rodriguez requesting a hand tool list for the gas tech.

Jan 30, 2025

Address an email From John Gomez about the PS-95 that was past due. Informed him I was working the issue with the Commission, (Yvonne) & Kathy, it could take a few weeks, I needed access to RAMPs & Pipes accounts.

Jan 30, 2025

Downloaded “The Ramp Administrator Guide & Access Management Process (RAMP) User Guide. Emailed both to Kathy to help her understand what I needed to happen for my access.

Jan 30, 2025

Address an email to Kathy Adams about information I was needing to complete the IP-092418 Completion Report.

Jan 31, 2025

Travel to City Gate (Castroville) to check odorant level. Both Tank 1 (EMPTY) & Tank 2 (EMPTY).

February 2025

- Feb 3, 2025** Working with Kathy, she was having problems getting into RAMPs. We needed her to grant me access.
- Feb 3, 2025** Schedule, delivery of Malodorant.
- Feb 3, 2025** Access the RRC Pipes program, Submitted City of Castroville PS-95. Emailed RRC Inspector, John, Ricky and Kathy – PS-95 submitted.
- Feb 3, 2025** Address an email from Kathy Adams about TML Annual Gas Operations Survey. Assisted Kathy with completing the 10 page form and helping to answering all the question.
- Feb 3, 2025** Address an email from Kathy Adams about the information I needed to address the PHMSA 7100 1-1 report due Mar 15, 2025. I needed Lost & Unaccountable gas information. Working report.
- Feb 4, 2025** Schedule, TRC was requested to attained the TML Audit Feb 13, 2025.
- Feb 4, 2025** Submitted, please fine the attachment (POC Completion Report) to IP – 0000092418 City of Castroville. 15 As-Built report with pressure test for the installation of Ploy service lines.
- Feb 10, 2025** Address an email from Ricky about attending TML Audit. I replied; to John G, Ricky C, Kathy A and Carol.
- Morning, we are currently working on quarterly checks and service for our customers. However, we are planning on making time to attend your meeting **and filling the odorizer on Wednesday**. So, we will see you on Thursday.
- Feb 11, 2025** Address an email From John Gomez about Pipeline Safety Inspection Package Number:00092418/POC Rejected. DIMP, I replied;
- I am work on the 2024/25 Distribution Facilities Replacement Report now, this is what they are asking to see.
- Feb 12, 2025** We met w/ John Washer of GOSS, Gas Odorant Service and Supply, to fill the odorizer at the City Gate. 14 lbs of Microbulk - Scentinel * E Gas Odorant was added. Mr Washer stated that the pipes for the odorant were corroded. He said that reports might start coming in about leaks due to odorant being added.
- Feb 13, 2025** Ricky Carrasco called about leak calls coming in. We drove to Castroville to assist with the leaks. We went to Elementary School, Fire Department responded, they tested levels and found no explosive limits of gas, but smell was strong. School was going to run fresh air to get rid of smell.
- Feb 13, 2025** After the TML meeting we spoke with Ricky and John about the Odor issue; I stated this is a normal part of Malodorant operations, however I believe that the odorizers are not needed. West Texas Gas delivers gas that is already odorized and no other City on the same line uses an odorizer. We filled it because Simon Pena informed me the City would keep using the odorizer. I asked both John and Ricky if they wanted me to turn the odorizer off. Ricky stated that the odorizer to be turned off.
- Feb 14, 2025** I spoke with John Washer about how system was set up to determine how to shut off odorizer without turning off gas. Mr. Washer advised he was not sure if the odorizer had a bypass and I would have to use my best guess to shut off without turning off gas.
- Feb 15, 2025** I spoke Robert Norris, he informed me about a leak complaint at the City Gate, with a very strong gas odor. I informed him to go investigate and call me back.
- Call back -- Could not find anything. He informed me he would return the next day and look again.
- Feb 16, 2025** I spoke Robert Norris, he informed me about a few small leaks at the City Gate and he sent me photos to review.

Feb 17 to 21, 2025 **Quarterly checks and services**

1. Odor Test & odorant level check
2. Patrol of Business District
3. Patrol Points 1 thru 5
4. Emergency Responder Liaison
5. Public Awareness
6. Continuing Surveillance. (Line Marker & Casings)
7. OQ Training
 - a. Robert Norris – Malodorant (odorant)
 - b. Ashton Botello-- Malodorant (odorant)
 - c. Robert Norris – Patrolling
 - d. Ashton Botello - Patrolling
 - e. Robert Norris – Monitoring Atmospheric Corrosion
 - f. Ashton Botello - Monitoring Atmospheric Corrosion
 - g. Robert Norris – Leak Survey
 - h. Ashton Botello - Leak Survey
 - i. Ashton Botello - Meter Replacement and leak detection

Feb 17, 2025 Met Robert Norris at City Gate, he showed me the small leaks on the regulator system at the City Gate. We inspected the Odorizer, Reading was down 7 lbs or 5 inches from when we filled it (Half of the odorant was gone) and the fill pipe is very corroded and could be leaking. We moved the valves again to stop (turn off) the odorizer. Travel to 204 River Bluff and took an odorant reading (0.08% very high odorant) last reading was Nov 13, 2024 (0.17% very high odorant)

Feb 18, 2025 Arrived at Gas Dept. and informed of a gas issue. Went to City Gate with Robert and Ashton. Checked for leaks, system was soaped down, and leaks were detected. Odorizer is very corroded at bottom of fill pipe and appeared to be leaking. The odorizer is in a state of disrepair, with two (2) valves in need of repair and corrosion. CPS Energy did not disclose any issues to us when we changed out the locks in October 2024 and review the piping at the City Gate.

Feb 19, 2025 Continued with quarterly checks, services and training. Conducted another odorant test at 204 River Bluff (7 miles from odorizer) took an odorant reading at 1:30pm (0.62% normal odorant level)

Feb 20, 2025 Continued with quarterly checks, services and training.

Feb 20, 2025 Completed quarterly checks, services and training. Conducted another odorant test at 204 River Bluff (7 miles from odorizer) took an odorant reading at 09:30am (0.75% normal odorant level)

Feb 24, 2025 Working on Drafting 2024/25 Distribution Facilities Replacement Report and Submitting Both Reports to RRC.