December 21, 2023

Karen Buckley, Executive Secretary
Public Service Commission of West Virginia
201 Brooks Street
Charleston, West Virginia 25301

Re: Mountaineer Gas Company and West Virginia-American Water Company
Case No. 23-0882-G-W-GI

Dear Ms. Buckley:

Attached for filing on behalf of Mountaineer Gas Company please find “Mountaineer Gas Company’s Responses to First Set of Interrogatories, Data Request or Requests for Information by the Staff of the Public Service Commission of Mountaineer Gas Company.” Twelve color copies of these responses have also been hand-delivered to the Commission this afternoon. To preserve the quality of the photos, please scan the hard copy in color.

Should you have any questions regarding this filing, please contact me.

Sincerely,

R. Booth Goodwin, II

cc: All Parties of Record
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Mountaineer Gas Company's Responses to First Set of Interrogatories, Data Request or Requests for Information by the Staff of the Public Service Commission of Mountaineer Gas Company

Mountaineer Gas Company ("Mountaineer" or "Gas Company"), by counsel, submits the following Responses to First Set of Interrogatories, Data Request or Requests for Information by the Staff of the Public Service Commission of Mountaineer Gas Company.

1.1 A complete, annotated timeline of events related to the incident which took place on or about November 10, 2023. Include times for receipt of first notification, crew and subcontractor call-out times, 811 center calls, notifications to West Virginia American Water Company and other utilities, time first crew arrived on-scene, time of leak shutoff line-deadening, time of repair completion, time of return to service and all other pertinent milestones associated with the incident.
RESPONSE:

The following timeline of events is provided based upon information available to Mountaineer at this time and is being provided in a good faith effort to comply with the Staff's requests in a timely manner. Except as noted, this information is based on information gathered by counsel. Mountaineer's investigation of this matter is ongoing, and therefore Mountaineer reserves the right to supplement or amend this timeline in the future.

Friday, November 10, 2023

2:36 p.m.: While completing an unrelated service call on the East End of Charleston, Mountaineer employee Bruce Basham receives a call from dispatch about an outage on 6th Avenue.

3:00 p.m. (approximate): Basham arrives at the location and confirms the outage.

3:06 p.m.: Basham removes the gas meter, which results in water gushing from the gas pipe connected to the meter. See photos below.
Recognizing this indicates a significant problem, Basham calls Tate Withrow, Gas Operations Manager. Withrow was at his home in Teays Valley at the time of the call. Withrow immediately travels to the West Side and requests dispatch to contact additional Mountaineer employees for emergency assistance.

3:07 p.m. (approximate): Within minutes of each other, multiple customers near Patrick Street on 3rd Avenue report having no gas.

3:13 p.m.: Dispatch calls Mountaineer employee Casey James and instructs him to come to the West Side.

3:16 p.m.: Dispatch calls Mountaineer employee Chris Henry and instructs him to come to the West Side.

3:40 p.m. (approximate): Withrow begins canvassing the West Side. He sees water flowing on the roadway and begins searching the area for signs of the primary water leak location.

3:48 p.m.: Withrow identifies what appears to be the primary leak location on Madison Street. The volume of water flow indicates water had been flowing for several hours. Withrow calls WVAW’s plant location (not customer service) and speaks to a WVAW employee to advise of the water leak and substantial flow of water above-ground.

4:00 p.m. (approximate): Withrow removes a gas meter at a location near the primary leak. Water gushes from the meter continuously.
Over the next several hours, Mountaineer employees work to remove approximately six gas meters in the vicinity of the primary water leak location. Water gushes from all of the meters.

4:10 p.m. (approximate): Mountaineer employees Chris Henry and Casey James arrive at the primary water leak location. They plan to drill through the gas line to alleviate pressure created by the water and begin to drain the line. After setting up barriers and pumps (to deviate water flow), Henry and James determine the heavy flow of water will prevent work on the gas line. Mountaineer determines it is unable to work on its lines until WVAW stops the water flow from the primary water leak location.

5:00 p.m. (approximate): Basham continues inspecting the area, specifically regulator stations on the West Side. The stations on Bream, Stockton, lower 4th Avenue, Florida, Glenwood, and Virginia Streets were all infiltrated with water.

5:38 p.m.: Dispatch calls Mountaineer employee Luke Mullins and directs him to go to the primary water leak location.

5:47 p.m.: Dispatch calls Mountaineer employee Josh McMillan and directs him to go to the primary water leak location.

6:00 p.m. (approximate): Mullins and McMillan arrive at the primary water leak location. Both observe heavy, continuous water flow.

6:00 p.m. – 5:00 a.m. (November 11): Mountaineer crews remain on location and on standby pending efforts by WVAW to shut off the water flow at the primary water leak location to allow Mountaineer to repair the gas line. WVAW crews advise Mountaineer crews that the delay is due to difficulty locating valves to shut off the flow.

Saturday, November 11, 2023

5:00 a.m. (approximate): WVAW stops the flow of water and excavates at the primary leak location to expose the water main and gas line. Even after the water to the affected main had been shut off, Mountaineer crews (McMillan, James, and Mullins) observe water continuing to flow in a jet stream from the water main. See photo below with time stamp 4:51 a.m. reflecting residual jet stream of water continuing to strike the gas line even after WVAW located and closed the valve to cut off water supply to the main. Mountaineer crew discovers a hole bored into the gas line at the exact point at which the water jet stream struck the gas line. See photo below time stamped 5:23 a.m.
5:23 a.m. (approximate): WVAW allows Mountaineer access to the gas line. Mountaineer crew (McMillan) places a Full Circle Clamp on the hole in the gas line, completing the repair within minutes of gaining access to Mountaineer’s line.
5:30 - 7:30 a.m. (approximate): Following repair of the water main leak, Mountaineer crews (Henry, James, Mullins and McMillan) resume work (first attempted at 4:10 p.m. the preceding day) near the underpass. Mountaineer employees Donny Waugh and James Thomas relieve Henry and James.

7:50 a.m. (approximate): The crews complete excavating a hole in the roadway and drill through the gas line with a Williamson drill, resulting in water spewing from the line.
Going Forward: Mountaineer crews undertake the process of purging water from its gas lines and customer lines in order to safely restore gas service. See exemplar photo below reflecting the “pigging” process required to fully remove the water from Mountaineer’s gas lines. To expedite service restoration, Mountaineer brought numerous crews to Charleston from around the State, and also retained private contractors. Still, due to the massive quantity of water in the gas lines, the purging and restoration process has been very time consuming and extensive.
Water being purged from gas lines using "pigging" process.
1.2 Any written communications between West Virginia American Water Company and Mountaineer Gas Company concerning the subject incident.

**RESPONSE:** Mountaineer believes communications with WVAW regarding the events described in the timeline were verbal (either in-person or telephonic). Mountaineer is continuing to investigate the matter and if documents are located, will supplement this response.
CERTIFICATE OF SERVICE

I certify service of “Mountaineer Gas Company’s Responses to First Set of Interrogatories, Data Request or Requests for Information by the Staff of the Public Service Commission of Mountaineer Gas Company” on December 21, 2023, upon the parties of record by electronic mail:

Christopher Howard, Esq.
Timothy Gibson, Esq.
Public Service Commission of West Virginia
201 Brooks Street
Charleston, WV 25301
choward@psc.state.wv.us
tgibson@psc.state.wv.us

Robert Passmore, Esq.
West Virginia-American Water Company
1600 Pennsylvania Avenue
Charleston, WV 25302-3932
robert.passmore@amwater.com

Robert F. Williams, Esq.
Director, Consumer Advocate Division
300 Capitol Street, Suite 810
Charleston, WV 25301
rwilliams@cad.state.wv.us

John Auville, Esq.
Heather B. Osborn, Esq.
Bobby Lipscomb, Esq.
Consumer Advocate Division
300 Capitol Street, Suite 810
Charleston, WV 25301
jauville@cad.state.wv.us
hosborn@cad.state.wv.us
blipscomb@cad.state.wv.us