

INTERMOUNTAIN GAS COMPANY

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IDAHO PUBLIC UTILITIES COMMISSION

December 20, 2018

Mr. Joe Leckie
Executive Director
Idaho Public Utilities Commission
P.O. Box 83720-0074
Boise, ID 83720-0074

Subject: Response to November 16, 2018 Notice of Probable Violations – Sawtooth District

Dear Mr. Leckie,

This letter is intended to address the November 16, 2018 Notice of Probable Violations identified by Idaho Public Utilities Commission (IPUC) during the May 15, 2018 HPSS specialized inspection of the Sawtooth District.

PROBABLE VIOLATIONS

1. **49 CFR §192.479(a) (b) Atmospheric corrosion control.**
Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere... Coating material must be suitable for the prevention of atmospheric corrosion.
2. **IGC's Standard Operating Procedure 4803 Atmospheric Corrosion Control 4. Color (4.1).**
Small Meter Sets and High Pressure Service Sets (HPSS) will be gray unless otherwise specified.
3. **IGC's Standard Operating Procedure 4803 Atmospheric Corrosion Control 4. Color (5.1).**
Apply the coating to ensure a uniform protective coating sufficient to prevent atmospheric corrosion and promote safe operation of the pipeline facility.
4. **49 CFR §192.605 (b)(1)(2) Procedural manual for operations, maintenance, and emergencies.**
Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and subpart M of this part. Controlling corrosion in accordance with the operations and maintenance requirements of subpart I of this subpart.

Findings:

During your inspection it was noted that the High Pressure Service Set (HPSS) for service line 00395-625 located at 114 S 600 West in Paul, Idaho had corrosion issues beyond what is considered light surface oxide, as a result it had numerous leaks. A contributing cause of the leaks is the lack of a uniform protective coating sufficient to prevent atmospheric corrosion.

Intermountain Gas Response

Intermountain Gas Company (IGC) acknowledges that the HPSS on service line 00395-625 had the presence of light surface oxide and leaks at some threaded connections. Within two weeks of receiving the May 14-16, 2018 Idaho PUC Pipeline Safety Inspection Summary findings, the Corrosion Technician investigated the HPSSs with reported shorts. Using trouble shooting methods, the Technician found the HPSS was not shorted to the corrugated metal pipe. On December 12, 2018, the Technician returned to take ultrasonic thickness (UT) readings of the pipe nipples included in the HPSS. All UT readings were within API 5L tolerances, thus indicating no wall loss due to corrosion. IGC affirms that since the pipe was being appropriately cathodically protected, we are promoting safe operation of the pipeline.

Additionally, no corrosion leaks were found. The leaks on the HPSS discovered during the IPUC inspection were repaired by greasing the inlet stop and tightening loose fittings. (See [Figure 1](#).) Lastly, IGC accelerated the HPPS Inspection schedule of this HPSS from 2019 to May 29, 2018. The inspection included painting the HPSS assembly, replacing the regulator and testing for lock-up.

Please contact Josh Sanders at (701) 222-7773 with questions or comments.

Respectfully Submitted,

A handwritten signature in black ink that reads "Pat Darras". The signature is written in a cursive style with a large initial "P".

Pat Darras
Vice President, Engineering & Operations Services
Intermountain Gas Company

Figure 1: HPSS - 116 S, 600 W, Paul, ID

