



Idaho Public Utilities Commission

PO Box 83720, Boise, ID 83720-0074

Brad Little, Governor

Paul Kjellander, Commissioner
Kristine Raper, Commissioner
Eric Anderson, Commissioner

April 30, 2019

Report # I201903

Pat Darras
Intermountain Gas Company
400 N 4th St.
Bismarck, ND 58501

Dear Mr. Darras:

On April 8-11, 2019 the Idaho Public Utilities Commission, Pipeline Safety Division, pursuant to Chapter 601 of Title 49, United States Code, conducted the field inspection of Intermountain Gas Company's (IGC) equipment in the Boise District.

During the inspection it was observed that some of the Idaho natural gas distribution system owned and operated by IGC was out of compliance on some items. This results in probable violations of the pipeline safety regulations Title 49, Code of Federal Regulations, Part 192. Those probable violations are listed below:

PROBABLE VIOLATIONS

1. **49 CFR §192.739 (a) (1) Pressure limiting and regulating stations: Inspection and testing.**
Each pressure limiting station, relief device (except rupture discs), and pressure regulating station and its equipment must be subjected at intervals not exceeding 15 months, but at least once each calendar year, to inspections and tests to determine that it is -- (1) In good mechanical condition.

Finding:

During the inspection it was noted that 5 regulator stations on the list were not plumbed for lock-up. Meter inspector was unable to demonstrate that the regulators were functioning properly and were able to lock-up when the necessity arrives.

2. **49 CFR §192.739 (a) (4) Pressure limiting and regulating stations: Inspection and testing.**
*Pressure limiting and regulating stations: Inspection and testing – reads: *Properly installed and protected from dirt, liquids, or other conditions that might prevent proper operation.* Which is also covered in IGC Procedure 4306 Sec 4.1.1.*

Finding:

During the inspection it was noted that regulator stations 40072 (primary), 40085 (primary), 40058 (primary), 40049 (primary), 40032 (primary), 40098 (primary) and 40094 (primary) had one of its regulators fail to lock up at the pre-established set point preventing proper operation.

3. 49 CFR § Appendix D of Part 192 – Criteria for Cathodic Protection and determination of measurements.

I. Criteria for cathodic protection – A. Steel... (1) A negative (cathodic) voltage of at least 0.85 volt, with reference to a saturated copper-copper sulfate half-cell. Determination of this voltage must be made with the protective current applied, and IAW sections II and IV of this appendix.

Finding:

During the inspection it was noted that at the following locations CP readings were below the standard: Casing 42509702 (-0.79), 42509703 (-0.79) and Reg Station 40048 (-0.53). CP technician was aware and investigating the cause.

Under Title 6, Idaho Statutes, You are subject to civil penalty under 61-712A. Civil penalty for violation. Any person who violates or fails to comply with, or who procures, aids or abets any violation of Title 61 of Idaho Code, governing safety of pipeline facilities and the transportation of gas, or of any order, decision, rule or regulation duly issued by the Idaho public utilities commission governing the safety of pipeline facilities and the transportation of gas, shall be subject to a civil penalty of not to exceed two thousand dollars (\$2,000) for each violation for each day that the violation persists. However, the maximum civil penalty shall not exceed two hundred thousand dollars (\$200,000) for any related series of violation.

A reply to this letter is required no later than 45 days from the date of this letter. Please send all documents to our office at P.O. Box 83720-0074, Boise, Idaho 83720-0074. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available.

You have a right to appear before the Pipeline Safety Division in an informal conference before June 13, 2019 at the Commission's offices at 472 W. Washington St, Boise. You have the right to present relevant documents to the Commission at the conference. At the informal conference, the Commission will make available to you any evidence which indicates that you may have violated the law, and you will have the opportunity to rebut this evidence. If you intend to request an informal conference, please contact the Pipeline Safety Division no later than May 30, 2019.

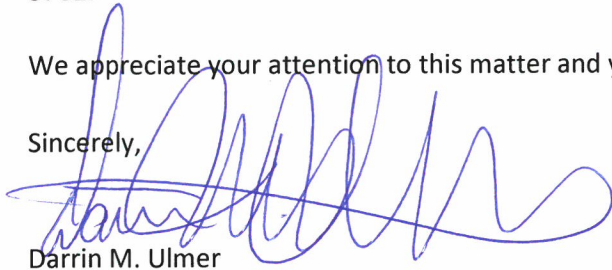
If you wish to dispute the allegations in this notice, but do not want the informal conference, you may send to the Pipeline Safety Division at the above address a written reply to this notice. This written reply must be filed with the Commission on or before June 6, 2019, and must be signed by a Company Official. The reply must include a complete statement of all relevant facts including a complete description of the corrective action you took to correct the non-compliance and actions to be taken to prevent future repeat failures in these areas of concern.

If you do not respond to this notice, as specified above, by June 13, 2019, you will be deemed to have admitted the allegations and will be subject to statutory civil penalties.

If you have any questions concerning this notice, please contact me at (208) 334-0331. Also all written responses should be addressed to me at the above address or you may fax your response to (208) 334-3762.

We appreciate your attention to this matter and your effort to promote pipeline safety.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Darrin M. Ulmer', is written over the word 'Sincerely,'.

Darrin M. Ulmer
Pipeline Safety, Program Manager
Idaho Public Utility Commission

