

INTERMOUNTAIN GAS COMPANY

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IDAHO PUBLIC
UTILITIES COMMISSION

June 20, 2019

Mr. Darrin Ulmer
Pipeline Safety, Program Manager
Idaho Public Utilities Commission
P.O. Box 83720-0074
Boise, ID 83720-0074

Subject: Response to May 31, 2019 Notice of Probable Violations – Twin Falls District

Dear Mr. Ulmer,

This letter is intended to address the May 31, 2019 Notice of Probable Violations identified by Idaho Public Utilities Commission (IPUC) during the May 14, 2019 follow-up High Pressure Service Set inspection of Intermountain Gas Company’s (IGC) equipment in Hailey, ID.

PROBABLE VIOLATIONS

1. 49 CFR §192.605(a) Procedural manual for operations, maintenance, and emergencies.

General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response.

IGC’s Standard Operating Procedure 3111.4 High Pressure Service Sets (HPSS)

-Definitions 4. Small HPSS ... Regulating facility capable of service up to two (2) service lines up to a maximum combined load of 700 CFH and may be located remotely or at the building.

-Procedure 1.5. Standard HPSS facilities that serve three or more service lines shall be reclassified and maintained as a district regulator station.

Finding:

HPSS 00967-521 is supplying 3 service lines located at 3661 A&B and 3671 A at 3671 A Buttercup, Hailey, ID.

Intermountain Gas Response

Intermountain Gas acknowledges that some service lines, including 00967-521 have more than two service lines connected downstream of the High Pressure Service Set (HPSS).

The HPSS Inspection Program which began in 2014 identifies HPSSs serving more than two service lines. The specific yes/no question on the HPSS Inspection Form is “HPSS serving less

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than three service lines”. As HPSSs with more than two service lines are identified, remedial action is taken. The preferred mitigation method is connecting the service lines to a distribution pressure system with a MAOP of 60 psig. Often this mitigation method requires the installation of a district regulator station and/or new distribution main the following budget year.

As mentioned in the IGC response to the IPUC’s January 28, 2019 NOPV, IGC is reviewing completed HPSS Inspection forms to confirm HPSSs identified as serving more than two service lines are either mitigated or scheduled for mitigation. The review will include a schedule for the outstanding mitigation or conversion of certain HPSSs to a district regulator station. IGC anticipates completing this review by December 31, 2019.

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, flowing style.

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