

INTERMOUNTAIN GAS COMPANY

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August 9, 2019

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

Subject: Response to July 2, 2019 Notice of Probable Violations – Boise District

Dear Mr. Ulmer,

This letter is intended to address the July 2, 2019 Notice of Probable Violations identified by the Idaho Public Utilities Commission (IPUC) as a result of the May 13, 2019 specialized inspection of Intermountain Gas Company's (IGC) contractor performing new service installations in Kuna, ID.

PROBABLE VIOLATIONS

1. **49 CFR §192.605(a) Procedural manual for operations, maintenance, and emergencies.**
Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response.
2. **IGC Procedure 4308 3.6 step 2.**
In service stubs (i.e. stub extensions) require a short purge to remove possible debris, reference procedures 3206 – Pipeline Purging and Cleaning.
3. **IGC Procedures 3206 2.6.2.1.**
New or replacement service lines one inch (1”) or smaller in diameter under 150 feet in length do not require the use of a CGI to verify 100% gas. Purge through service riser until a strong gas odor is smelled and a tone shift is heard.
4. **IGC Procedure 4100.1 2.8**
Remove the squeezers and mark the plastic pipe in the location of the pinch to ensure a re-squeeze will not occur in that location.

Finding:

We observed a Das-co employee performing a tie-in at 2756 W. Midnight in Kuna, ID. When we approached the tie-in location we noticed he had the service stub already squeezed off but had wrapped the stub with multiple wraps of electrical tape in the squeeze location prior to applying the squeezers directly on top of the tape. He then unscrewed the cap-n-go coupling and released the squeezers to see if there was gas in the line. He then re-squeezed the service line in the same spot to shut down the gas flow. When asked why he did that and if it was part of the procedure, he couldn't answer if it was or wasn't in the procedure but stated that's the way he was taught and how everyone does it. No fire extinguisher was present. Once their supervisor arrived we had brought up our concern about the way the employee had released the squeezers to let gas purge into the bell hole the way he did and he didn't see the concern as they've always done it that way.

Intermountain Gas Response

IGC acknowledges that Procedures 4308 – Excess Flow Valves (EFV) and 3206 – Pipeline Purging and Cleaning had conflicting statements related to the short purge completed on a stub prior to installing an EFV. Therefore, a procedure review was conducted which resulted in minor edits that better aligned Procedures 4308 and 3206. The updated procedure was provided to the IPUC via a secured email delivery on July 11, 2019.

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Applying the squeeze tool and then allowing it to relax in order to purge the line does not constitute removing the squeeze tool, so this is not considered re-squeezing. Although not specifically stated in Section 11.4.9 of Procedure 3010 – Natural Gas Emergency Response Plan, the intent is to mark the squeeze location after the removal of the squeeze tool.

Any pinch off location on plastic pipe shall be marked with either a black permanent marker or black electrical tape at the squeezed portion of the pipe to prevent additional pinch offs in that location.

Das-co management addressed the proper application of electric tape during their Monday, July 8, 2019 weekly safety meeting. Because instruction related to squeezing plastic pipe is addressed in multiple procedures, annual plastic joining training and Operator Qualifications, the MDU Utility Group is drafting a new procedure, OPS 309 – Squeeze-Off of Plastic Pipe. OPS 309 will be provided to the IPUC once finalized, approved and implemented.

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

Respectfully Submitted,



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