

# INTERMOUNTAIN GAS COMPANY

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UTILITIES COMMISSION

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 – Twin Falls District

Dear Mr. Ulmer,

This letter is intended to address the July 2, 2019 Notice of Probable Violations identified by Idaho Public Utilities Commission (IPUC) as a result of the June 10-13, 2019 field inspection of Intermountain Gas Company's (IGC) equipment in the Twin Falls District.

## 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 1 regulator station on the list was not plumbed for lock-up. Meter inspector was unable to demonstrate that the regulator was functioning properly and was able to lock-up when the necessity arises.

## Intermountain Gas Response

As mentioned in IGC's December 21, 2018 response to the November 16, 2018 Notice of Probable Violations – Idaho Falls District (previously Teton District) and IGC's June 5, 2019 response to the April 30, 2019 Notice of Probable Violations – Boise District, IGC has completed a data review of all regulator station inspections from the previous year. From this review it has been determined that 89 regulator stations are not plumbed for a gauge or other appurtenance to test for lock-up. Subsequently, IGC is conducting an engineering review of each of the 89 regulator stations to determine the best solution to resolve the issues pertaining to lock-up testing. The engineering review will include a schedule and plan for the retrofit, replacement, or abandonment of the 89 regulator stations. IGC anticipates completing this engineering review by December 31, 2019.

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 50038, 50112, and 50114 had one or both regulators fail to lock up at the pre-established set point preventing proper operation.

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### Intermountain Gas Response

As mentioned in IGC's December 13, 2018 response to the November 16, 2018 Letter of Concern and IGC's June 5, 2019 response to the April 30, 2019 Notice of Probable Violations, IGC is currently investigating the application of filtration devices at each IGC regulator station that failed lock-up two or more times during the three-year period from 2016-2018. The initial data review was completed in June 2019. The remediation plan will include an installation schedule for the locations where debris filtration is identified as a potential solution. Regulator Stations 50038 and 50114 were identified during the initial review and therefore will be evaluated for filtration, however Regulator Station 50112 was not. If the primary or secondary regulator of Regulator Station 50112 fails lock-up during the 2020 annual inspection, it will be investigated for the application of filtration devices.

**3. 49 CFR §192.707(a)(1) Line markers for mains and transmission lines.**

*...a line marker must be placed and maintained as close as practical over each buried main and transmission line: At each crossing of a public road and railroad; and...*

**Finding:**

During the inspection it was noted that along regulator station 50109 the markers were laying on the ground, not visible and needed to be installed properly.

### Intermountain Gas Response

IGC acknowledges the line marker near Regulator Station 50109, a Class 1 location, was damaged and not visible. This line marker was replaced in a more appropriate location near Regulator Station 5019. Please see **Figure 1**.

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

Respectfully Submitted,



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



Figure 1: Line Marker Near Reg Station 50109

