

INTERMOUNTAIN GAS COMPANY

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IDAHO PUBLIC
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 – Nampa 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 17-21, 2019 field inspection of Intermountain Gas Company's (IGC) equipment in the Nampa 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 seven regulator stations on the list were 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 stations 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 30025, 30027, 30035, 30052, 30053, 30078, 30084 and 30095 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. The eight regulator stations (30025, 30027, 30035, 30052, 30053, 30078, 30084 and 30095) that had one or both regulators fail to lock-up at the pre-established set point were not identified during the initial review. A review of each station's maintenance history from January 2014 to July 2019 identified minimal instances when the primary or secondary regulator failed to lock-up. See **Figure 1**. If the primary or secondary regulator at these eight regulator stations fail to lock-up during the 2020 annual inspection, they will be investigated for the application of filtration devices.

3. 49 CFR §192.199 (h) Requirements for design of pressure relief and limiting devices.

...Except for a valve that will isolate the system under protection from its source of pressure, be designed to prevent unauthorized operation of any stop valve that will make the pressure relief valve or pressure limit device inoperative....

Finding:

During the inspection it was noted that on regulator station 30044 the relief valve was not secure upon arrival the lock was laying on the ground below the valve.

Intermountain Gas Response

IGC acknowledge the relief at regulator station 30044 was not properly locked. Before the conclusion of the station inspection, the IGC meter inspector properly installed the lock upstream of the relief valve.

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: Lock-up Summary

Nampa Regulator Station Lock-up Summary

Year	Asset ID	Regulator 1 Operated Properly	Regulator 2 Operated Properly
2019	30025	Yes	Yes
2018	30025	Yes	Yes
2017	30025	No	Yes
2016	30025	Yes	Yes
2015	30025	Yes	Yes
2014	30025	Yes	No
2019	30027	Yes	Yes
2018	30027	Yes	Yes
2017	30027	Yes	Yes
2016	30027	Yes	Yes
2015	30027	Yes	Yes
2014	30027	Yes	Yes
2019	30035	Yes	Yes
2018	30035	Yes	Yes
2017	30035	Yes	Yes
2016	30035	Yes	Yes
2015	30035	Yes	Yes
2014	30035	Yes	Yes
2019	30052	Yes	Yes
2018	30052	Yes	Yes
2017	30052	Yes	Yes
2016	30052	No	Yes
2015	30052	Yes	Yes
2014	30052	yes	yes
2019	30053	No	Yes
2018	30053	Yes	Yes
2017	30053	Yes	Yes
2016	30053	Yes	Yes
2015	30053	No	Yes
2014	30053	yes	yes
2019	30078	No	Yes
2018	30078	Yes	Yes
2017	30078	No	Yes
2016	30078	Yes	Yes
2015	30078	Yes	Yes
2014	30078	Yes	Yes
2019	30084	Yes	Yes
2018	30084	Yes	Yes
2017	30084	Yes	Yes
2016	30084	no	Yes
2015	30084	Yes	Yes
2014	30084	Yes	Yes
2019	30095	Yes	Yes
2018	30095	Yes	No
2017	30095	Yes	Yes
2016	30095	Yes	Yes
2015	30095	Yes	Yes
2014	30095	Yes	Yes