



## Idaho Public Utilities Commission

PO Box 83720, Boise, ID 83720-0074

Brad Little, Governor

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

July 2, 2019

Report # I201907

Pat Darras  
Intermountain Gas Company  
400 N 4<sup>th</sup> St.  
Bismarck, ND 58501

Dear Mr. Darras:

On June 17-21, 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 Nampa 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. The probable violations are as follows:

### **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.

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.

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 limiting 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.

**REQUESTED ACTION**

A reply to this letter, as outlined below, 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 may be a public record, subject to disclosure under Idaho's Public Records Law. See Idaho Code § 74-101-126.

You have a right to appear before the Pipeline Safety Division in an informal conference before August 19, 2019, at the Commission's offices at 472 W. Washington St, Boise. You have the right to present relevant documents to the Commission at that 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 August 5, 2019.

If you wish to dispute the allegations in this notice, but do not want an informal conference, you may send the Pipeline Safety Division a written reply to this notice. This written reply must be filed with the Commission on or before August 19, 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(s) taken and any and all actions to be taken to prevent future failures in these areas of concern.

If you do not respond to this notice, as specified above, by August 19, 2019, you may be subject to statutory civil penalties and further enforcement, as allowed by law. Idaho Code § 61-712A states that "[a]ny person who violates or fails to comply with, or who procures, aids or abets any violation of title 61, 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."

If you have any questions concerning this notice, please contact me at (208) 334-0321. Also all written responses should be addressed to me at the above address or you may fax your response to (208) 334-4045. We appreciate your attention to this matter and your effort to promote pipeline safety.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Ulmer', written over a horizontal line.

Darrin M. Ulmer

Pipeline Safety, Program Manager  
Idaho Public Utility Commission