## INTERMOUNTAIN GAS COMPANY

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

Subject: Response to July 15, 2019 Notice of Probable Violations - Nampa District

Dear Mr. Ulmer,

This letter is intended to address the July 15, 2019 Notice of Probable Violations identified by Idaho Public Utilities Commission (IPUC) as a result of the July 3, 2019 onsite specialized inspection of Intermountain Gas Company's (IGC) contractors performing new service installations in Caldwell, 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 4100.1 2.8

Remove the squeezers and mark the plastic pie in the location of the pinch to ensure a re-squeeze will not occur in that location.

## Finding:

We observed a Das-co employee installing new ¾" service lines to 2 new homes on Nantucket St. in Caldwell, ID. When we approached the installation location we noticed an employee was prepping the service stub to be squeezed off for the tie-in, he 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. When asked why he taped prior to squeezing he stated: "it was to show where he squeezed the line". IGC Engineering Assistant (EA) was informed of this concern. The EA instructed the crew not to do it again. This is the second time this incident has been observed.

## **Intermountain Gas Response**

IGC acknowledges that during the installation of the service line at 3923 Nantucket St., Caldwell, ID, Das-co placed black tape at the squeeze location prior to squeezing the <sup>3</sup>/<sub>4</sub>" plastic stub. 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 Utilities 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

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Intermountain Gas Company