



Idaho Public Utilities Commission

PO Box 83720, Boise, ID 83720-0074

Brad Little, Governor

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

July 15, 2019

Report # I201909

Pat Darras
Intermountain Gas Company
400 N 4th St.
Bismarck, ND 58501

Dear Mr. Darras:

On July 8-10, 2019, representatives of the Idaho Public Utilities Commission, Pipeline Safety, pursuant to Chapter 601 of Title 49, United States Code, conducted the field inspection of Intermountain Gas Company's (IGC) equipment in the Pocatello 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 & 3) Pressure limiting and regulating stations: Inspection and testing.**
Pressure limiting and regulating stations: Inspection and testing – reads: *1.) In good mechanical condition. 3.) Except as provided in ... set to control or relieve at the correct pressure consistent with the pressure limits of 192.201 (a).*

Finding:

During the inspection it was noted that: regulator station 60076 had tubing leaks on both pilot inlets and regulator station 60118 had one or both regulators fail to lock up at the pre-established set point preventing proper operation.

2. **49 CFR § Appendix D of Part 192 – Criteria for Cathodic Protection and determination of measurements.**
I. Criteria for cathodic protection – A. Steel... (1) A negative (cathodic) voltage of at least 0.85 volt, with reference to a saturated copper-copper sulfate half-cell. Determination of this voltage must be made with the protective current applied, and IAW sections II and IV of this appendix.

Finding:

During the inspection it was noted that at the following locations had CP readings that were below the requirement of -0.85: Regulator Stations 60067 and 60068 (-0.81 on both regulators). CP technician stated that he would be placing anodes in the area to elevate the low readings.

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.

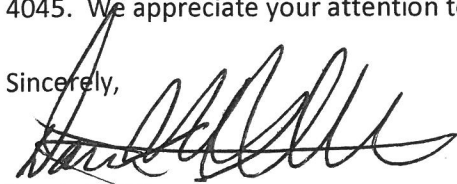
You have a right to appear before the Pipeline Safety Division in an informal conference before September 3, 2019, at the Commission's offices at 472 W. Washington St, Boise. You have the right to present relevant documents to the Commission at that conference. The Commission will make available to you 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 20, 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 September 3, 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 September 3, 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,



Darrin M. Ulmer
Pipeline Safety, Program Manager
Idaho Public Utility Commission