

# INTERMOUNTAIN GAS COMPANY

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UTILITIES COMMISSION

December 20, 2019

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

Subject: Response to November 26, 2019 Letter of Concern – Payette, Idaho (Report # 1201910)

Dear Mr. Ulmer,

This letter is intended to address the November 26, 2019 Letter of Concern issued by Idaho Public Utilities Commission (IPUC) as a result of the November 25, 2019 construction inspection of Intermountain Gas Company's (IGC) 19IGC-2004 project located at NW 11<sup>th</sup>-Kennedy, Washoe Rd in Payette, Idaho.

## ITEM OF CONCERN

**1. 49 CFR §192.605(a) General.**

Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.

**Finding:**

During the inspection it was noted that the DAS-CO welding crew employed by IGC, did not have a contact pyrometer or infrared pyrometer to check the preheat temperature at the weld groove and weld area as required by IGC Operations and Maintenance Manual procedure 4106.1 (1.16.1).

## Intermountain Gas Response

IGC acknowledges that the Das-co Welder mentioned in the IPUC findings did not have a pyrometer to check the preheat temperature of the weld.

On November 26, 2019, the following immediate action required email communication was distributed to IGC District Operations Managers

*Per IGC standard operating procedure 4106 - Welding General Standards welders shall check preheat with a pyrometer.*

*1.16.1. Preheat temperature shall be checked with a contact pyrometer or infrared pyrometer at the weld groove and weld area.*

*Please ensure all IGC and Contractor Welders have the required tools to follow the welding procedure specifications from 4107 - Qualifying Welding Procedures and Welding Procedure Specifications (WPS). This includes a pyrometer and volt meter, both of which shall be calibrated per the requirements of OPS 501 – Equipment Calibration, Maintenance and Testing. Please remind all Engineer Associates they need to inspect for these items as taught at the College of Western Idaho Basic Weld Inspection class.*

EXECUTIVE OFFICES

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Positive response was received from each district stating they reviewed the procedural requirements with Company Welders and Contractors. Additionally, IGC District Operations Managers verified Company and Contract Welders have calibrated or newly purchased pyrometers to verify preheat temperatures.

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

Respectfully Submitted,

A handwritten signature in cursive script that reads "Pat Darras".

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