Idaho Public Utilities Commission
PO Box 83720, Boise, ID 83720-0074

Brad Little, Governor
Paul Kjellander, Commissioner
Kristine Raper, Commissioner
Eric Anderson, Commissioner

Letter of Concern

November 26, 2019 Report # I201911

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

Dear Mr. Darras:

On November 22, 2019, representatives of the Idaho Public Utilities Commission, Pipeline Safety, pursuant to Chapter 601 of Title 49, United States Code, conducted an onsite construction inspection of project 367-0333 located at W Beacon Light Rd & N Wind Rd in Star, Idaho for the Trident Ridge Sub No 1.

As a result of the inspection, it appears there are area(s) of concern that do not fully meet the intent of the pipeline safety regulations Title 49, Code of Federal Regulations, Part 192 for calendar year 2019.

The item(s) listed below are of concern:

1. § 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.*

2. *Standard Operating Procedures 4027 – Plastic Qualifications and Joining*
   JOINING OF PLASTIC PIPE
   2.1. BUTT FUSION
   2.1.6. The surface temperature of the heating tool faces shall be in accordance with manufacturer recommendations. The heating tool shall have a built-in thermometer. Pyrometers are the preferred method to assure proper heating tool face temperature.

During the inspection it was noted that the Track Utilities crew, employed by IGC, were using uncalibrated contact pyrometers to check the temperature of the heater plate used for butt fusions as required by IGC and manufacturers recommendations.

Cooper-Atkins suggests a one (1) year calibration interval. The calibration interval can be adjusted and should be chosen based on factors such as amount of use, severity of handling, and environmental conditions. The interval can be adjusted as a history of the thermometer's performance is developed. We do suggest however, that the measuring system (thermometer and probe) be periodically verified at known temperature points to ensure that the thermocouple itself has not changed or been damaged during use.

The above mentioned items were brought to the attention of your representatives during the onsite inspections. We would request that you review these matters and respond in writing within 30 days regarding the above issue including any planned corrective actions.

If you have any questions concerning this notice, please contact me at (208) 334-0321. All written responses should be addressed to me at: 11311 W Chinden Blvd, Ste 201-A, Boise, Idaho 83714 or you can fax your response to (208) 334-3762.

Because of the good faith that you have exhibited up to this time, we expect that you will take action to bring your program into compliance with pipeline safety regulations.

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