

INTERMOUNTAIN GAS COMPANY

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IDAHO PUBLIC 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 December 11, 2019 LETTER OF CONCERN – Twin Falls District (Report # 1201912)

Dear Mr. Ulmer,

This letter is intended to address the December 11, 2019 Letter of Concern regarding the onsite construction inspection of the 583-1983 project conducted by the Idaho Public Utilities Commission on December 5, 2019.

ITEMS OF CONCERN

I. §192.605 Procedural manual for operations, maintenance, and emergencies

(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(s):

During an inspection of a KV utilities crew, a contractor for IGC, the improper use of a squeezer was observed by one of our inspectors. It was noted that the crew was attempting to perform a squeeze of a service stub without the use of a ground rod per procedure 4100.1 (2.2) of IGC’s Operations and Maintenance Manual. Additionally the use of soapy burlap at the pipe to soil interface was not used. Another concern identified is, in IGC’s O&M manual the only mention of how to apply a squeezer is listed in 4100.1 Section 2 Abandonment of polyethylene pipe.

Intermountain Gas Response

Intermountain Gas Company (IGC) procedure 4100 *Abandoning Pipeline Facilities* was superseded by OPS 607 *Abandonment of Underground Pipelines* on October 9, 2019. Moreover, a new procedure, OPS 309 *Squeeze-Off of Plastic Pipe*, has been approved via Management of Change (MOC) and will be implemented on February 3, 2020. Training for the new procedure will be conducted throughout the month of January. OPS 309 establishes guidelines for the squeeze-off of plastic pipelines during maintenance and installation. In addition, a new guidance document has been created and is pending approval in MOC (OPSMOC-301) that details the Wet Burlap Method for mitigating risks involved with electrostatic discharge.

District Operations Managers met with the superintendents of Das-co of Idaho, KV Inc. and Track Utilities that perform squeeze-offs of plastic pipe that as instructed during the Operator Qualification training provide by the Technical Training department, they shall ground squeeze-off tools with an approved static electric grounding device before placing the squeeze-off tool on the pipe.

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IGC believes the meetings held with the contractor superintendents in combination with the extensive OPS 309 training scheduled for January 2020 will eliminate future occurrences of improper use of squeeze-off tools.

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