

NORTHWEST GAS PROCESSING, LLC

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CORPORATE OFFICE
16600 Park Row
Houston, TX 77084

2019 DEC 17 PM 2:06
IDAHO PUBLIC
UTILITIES COMMISSION

December 13, 2019

Mr. Darrin M. Ulmer
Idaho Public Utilities Commission
P.O. Box 83720
Boise, Idaho 83720-0074

Re: Northwest Gas Processing, LLC (NWGP)
Pipeline Safety Division Inspection – September 30 and October 3, 2019

Dear Mr. Ulmer:

We are in receipt of your November 5, 2019 letter and respectfully submit the following response to the Probable Violations:

Item No 1

Requirement: 49 CFR § 192.605(a) Procedural manual for operations, maintenance and emergencies

Finding: The inspection found that NWGP has no records that leakage surveys with leak detector equipment have ever taken place.

NWGP Response: TEAM, Inc conducts quarterly leakage surveys with FLIR equipment throughout our Hwy 30 facility to comply with the IDEQ air permit, but not along the pipeline. NWGP agrees with this finding and, beginning in the first quarter of 2020, will have The Compliance Group conduct leakage surveys in accordance with 49 CFR 192.706.

Item No 2

Requirement: 49 CFR § 192.615(c)(1),(2),(3), and (4); Emergency Plans, public liaison
49 CFR § 192.616(c); Public Awareness

Finding: Although NWGP attended a Payette County LEPC meeting on February 22, 2018, there is no documented proof that NWGP learned the responsibility and resources of each government organization that may respond to a hazardous emergency, and acquaint officials with NWGP's ability to respond.

NWGP Response: Documentation was presented during the records inspection confirming Stephen Hernandez's meeting with local officials on September 16, 2019. We are attaching NWGP's 2019 liaison packet presented to these officials at that time. NWGP will meet with appropriate fire, police and other emergency officials during or before the last quarter of 2020. As discussed with Mr. Bruce Perkins on November 20, 2019, NWGP extends an invitation to IPUC to join them during these visits.

Item No 3

Requirement: 49 CFR § 192.706 Transmission Lines: Leakage Surveys

Finding: NWGP stated that no leakage surveys with leak detector equipment have taken place.

NWGP Response: NWGP agrees with this finding and, as stated in response to Item No. 1 above, will initiate a leakage survey program.

Item No 4

Requirement: 49 CFR § 192.491(c) Corrosion Control Records

Finding: NWGP stated it was unable to locate records prior to 2018.

NWGP Response: NWGP maintains records from April 2018 and forward.

Item No 5

Requirement: 49 CFR § 192.463(b)(2) External corrosion control: Cathodic protection

Finding: During the field inspection on September 30, 2019 it was discovered that the Rectifier at Little Willow was shut off. The CP tech had turned it off while taking an instant off reading and forgot to turn it back on.

NWGP Response: NWGP agrees with this finding and has re-trained personnel and has included signage at rectifier so that it is turned back on following all readings.

Item No 6

Requirement: 49 CFR § 192.743(a) Pressure limiting and regulating sessions: Capacity of relief devices

Finding: NWGP has no records that the testing of relief devices in place or by review and calculations.

NWGP Response: NWGP agrees with this finding.

Northwest Gas Processing is committed to full compliance with the Idaho Public Utilities Commission's rules and appreciates your consideration in this matter. Please contact me at 281-994-5429 or dkassab@high-mesa.com if I can provide additional information.

Sincerely,

A handwritten signature in cursive script that reads "Diane Kassab".

Diane M. Kassab
Regulatory Compliance Manager

Attachments