



# Idaho Public Utilities Commission

PO Box 83720, Boise, ID 83720-0074

Brad Little, Governor

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

March 17, 2020

Report # I202001

Pat Darras  
Intermountain Gas Company  
400 N 4<sup>th</sup> St.  
Bismarck, ND 58501

Dear Mr. Darras:

On March 12, 2020, 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 20JUS-26 located at 2137 and 2119 E. Trophy St in Kuna Idaho.

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. **§ 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 (SOP) 4308.4 – Excess Flow Valves**  
*Installation Requirements*  
3.6. *The general process for installation of an EFV for residential service is:*  
3.6.(2) *Using air or inert gas purge the upstream and downstream service line pipe clear of debris. In service stubs (i.e. stub extensions) require a short purge to remove possible debris, reference procedure 3206 – Pipeline Purging and Cleaning.*

### **Finding:**

Employees of the IPUC were observing a Dasco crew install a new branch service to residential homes in Kuna, ID. During the inspection it was noted that the crew was not following the general installation process of an EFV for a residential service. The employee did not purge the new service lines with air or inert gas to clear lines of debris before installing the EFV. The

employee also failed to perform a short purge of the in-service stub to remove possible debris before tying it into the EFV.

### 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.

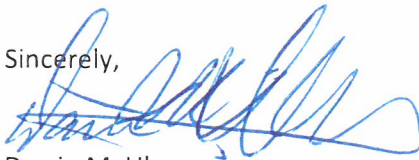
You have a right to appear before the Pipeline Safety Division in an informal conference before May 1, 2020, at the Commission's offices at 11331 W Chinden Blvd, Boise. You have the right to present relevant documents to the Commission at that conference. The Commission will make available to you any 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 April 17, 2020.

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 April 24, 2020, 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 May 1, 2020, 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