

EXECUTIVE OFFICES

INTERMOUNTAIN GAS COMPANY

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IDAHO PUBLIC
UTILITIES COMMISSION

July 23, 2020

Mr. Darrin Ulmer, Programs Manager
Idaho Public Utility Commission
PO Box 83720
Boise, ID 83720-0074

Subject: Response to Letter of Concern dated June 19, 2020 (Report # 1202002)

Dear Mr. Ulmer,

This letter is intended to address one area of concern stemming from an onsite, specialized field inspection conducted June 8-10, 2020 in Intermountain Gas Company's (IGC) Nampa District. Specifically, we are addressing how we plan to bring the area of concern into full compliance.

AREA(S) OF CONCERN

1. §192.481(a)(b)(c) Atmospheric corrosion control: monitoring.
(a) Each operator must inspect each pipeline or portion of pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion. (b) During inspections the operator must give particular attention to pipe at soil-to-air interfaces, under thermal insulation, under disbanded coatings, at pipe supports, in splash zones, at deck penetrations, and in spans over water. (c) If atmospheric corrosion is found during an inspection, the operator must provide protection against the corrosion as required by § 192.479.

2. Cascade Natural Gas Corporation-OPS 610 (Sec 2.1, 2.2 and 2.2.5), 2.1-reads:
Transmission and distribution pipelines shall be patrolled, as necessary, to observe factors affecting safe operation and to enable correction to potentially hazardous conditions. In addition to visual evidence of leakage, patrol considerations should include observation and reporting of potential hazards. 2.2-reads: Factors affecting safe operation include: 2.2.5-reads: Exposed pipe conditions including atmospheric corrosion, physical deterioration of exposed piping, pipeline spans, and structural pipeline supports such as bridges, pilings, headwalls, casings, and foundations.

Pipeline patrol ACP317006 appeared to have no hangars, possible contact with bridge and coating/wrap deteriorated at the interface with the bridge.

Intermountain Gas Response

Intermountain Gas Company (IGC) acknowledges the findings brought forth by the IPUC stated above. ACP-317-006 was identified for replacement in February 2020. The existing crossing will be replaced in August 2020 with a new above ground crossing on the south side of the bridge. The crossing will be installed per the requirements of IGC Standard Operating Procedure 3120 – Suspended Pipeline Systems which will allow IGC to meet the inspection criteria of MDU Utilities Group Policy Statement OPS 610 – Pipeline Patrolling and Continuing Surveillance.

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

Respectfully Submitted,



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