



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

June 19, 2020

Report # I202002

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

Dear Mr. Darras:

On June 8-10, 2020, representatives of the Idaho Public Utilities Commission, Pipeline Safety, pursuant to Chapter 601 of Title 49, United States Code, conducted an onsite specialized field inspection in your Nampa District.

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 2020.

The item(s) listed below are 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 disbonded 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*

pipng, 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.

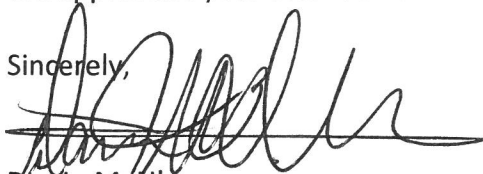
The above mentioned items were brought to the attention of your representatives during the onsite inspections. We would request that you review these matters and respond in writing within 30 days regarding the above issue including any planned corrective actions.

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,

A handwritten signature in black ink, appearing to read 'Darrin M. Ulmer', written over a horizontal line.

Darrin M. Ulmer

Pipeline Safety, Program Manager
Idaho Public Utility Commission