

EXECUTIVE OFFICES

INTERMOUNTAIN GAS COMPANY

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IDAHO PUBLIC
UTILITIES COMMISSION

July 29, 2020

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

Subject: Response to Notice of Probable Violations dated June 19, 2020 (Report # 1202004)

Dear Mr. Ulmer,

This letter is intended to address three probable violations stemming from a field inspection of Intermountain Gas Company's (IGC) equipment in the Boise District conducted June 15-18, 2020. Specifically, we are addressing how we plan to bring the probable violations into full compliance.

PROBABLE VIOLATIONS

1. 49 CFR §192.739 (a) (1) Pressure limiting and regulating stations: Inspection and testing.

Each pressure limiting station, relief device (except rupture discs), and pressure regulating station and its equipment must be subjected at intervals not exceeding 15 months, but at least once each calendar year, to inspections and tests to determine that it is -- (1) In good mechanical condition.

Finding:

During the inspection it was noted that 3 regulator stations on the list were not plumbed for lock-up. Meter inspector was unable to demonstrate that the regulators were functioning properly and were able to lock-up when the necessity arrives.

Intermountain Gas Response

IGC acknowledges the findings brought forth by the IPUC stated above. As stated in previous responses, IGC created a *Not Plumbed for Lockup Mitigation Plan*. The plan identified regulator stations that are not equipped with pressure ports to perform flow and lockup and includes a ten-year mitigation schedule. Regulator station 40165 was retired on July 13, 2020. Regulator stations 40167 and 40170 are scheduled to be retrofitted in 2021.

2. 49 CFR §192.739 (a) (4) Pressure limiting and regulating stations: Inspection and testing.

Pressure limiting and regulating stations: Inspection and testing – reads: Properly installed and protected from dirt, liquids, or other conditions that might prevent proper operation. Which is also covered in IGC Procedure 4306 Sec 4.1.1.

Finding:

During the inspection it was noted that regulator station 40169 (primary) had one of its regulators fail to lock up at the pre-established set point preventing proper operation.

Intermountain Gas Response

IGC acknowledges the findings brought forth by the IPUC stated above. Because the regulators at regulator station 40169 did not fail a lockup test two or more times during calendar years 2016-2018, regulator station 40169 was not included in the IGC *Failed to Lockup Mitigation Plan*. The following table was extracted from the annual inspection questions, *Regulator 1 Operated Properly* and *Regulator 2 Operated Properly*. Based on

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the 2017-2020 annual inspection results and because the regulator was repaired after the failed lockup that occurred during the June 15-18, 2020 field inspection, regulator station 40169 was not added to the *Failed Lockup Mitigation Plan*.

Station Number	2017 Reg 1	2017 Reg 2	2018 Reg 1	2018 Reg 2	2019 Reg 1	2019 Reg 2	2020 Reg 1	2020 Reg 2	Add to Plan
40169	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No

3. 49 CFR §192.605 (a) Procedural manual for operations, maintenance, and emergencies

Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response...

IGC Procedure 3120.2 2.4

Pipelines installed through pipe hangers shall be centered in the hanger and the pipe must not come in contact with the bracket.

Finding:

During the inspection it was noted that patrol PP425011 was off center and making contact with the bracket.

Intermountain Gas Response

IGC acknowledges the findings brought forth by the IPUC stated above. The pipeline hanger at PP-425-011 located at South Eckert Road and the Boise River was adjusted on June 22, 2020. (See Figure 1.)

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

Respectfully Submitted,



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

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Figure 1

**PP425011 located at South Eckert
Road and the Boise River**



BEFORE

AFTER