

EXECUTIVE OFFICES

INTERMOUNTAIN GAS COMPANY

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IDAHO PUBLIC
UTILITIES COMMISSION

August 5, 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 July 14, 2020 (Report # 1202005)

Dear Mr. Ulmer,

This letter is intended to address three probable violations stemming from a field inspection of Intermountain Gas Company (IGC) equipment in the Twin Falls District conducted July 6-7, 2020. Specifically, we are addressing how we plan to bring the probable violations into full compliance.

AREA(S) OF CONCERN

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 1 regulator station on the list was 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. When the *Not Plumbed for Lockup Mitigation Plan* was created, regulator station 50096 was identified for rebuild in 2029. The mitigation date has been updated and regulator station 50096 will be rebuilt in 2020.

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 50087 (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 50087 did not fail a lockup test two or more times during calendar years 2016-2018, regulator station 50087 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*. Because

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the lockup failures that occurred during the 2020 annual inspection and the July 6-7, 2020 field inspection where unrelated to wear, sulfur, or debris, regulator station 50087 was added to the *Failed Lockup Mitigation Plan* with Monitor as the Mitigation Option.

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
50087	No	Yes	Yes	Yes	Yes	Yes	No	No	Yes

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 2.3

Pipelines installed through or in contact with structural supports (i.e. concrete abutments, piers, walls, etc. shall be insulated from and supported by the structure.

Finding:

Patrol ACP-575-001 gas line/wrap was touching the wing wall, concern of rubbing coating away.

Intermountain Gas Response

IGC acknowledges the findings brought forth by the IPUC stated above. Past inspections have not indicated coating deterioration where the pipeline is in contact with concrete. The replacement of ACP-575-001 will be added to the 2022 capital budget. The new pipeline will be bored under the canal. Once the 2022 budget is approved, the replacement project will be scheduled with an estimated completion date of April 15, 2022.

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

Respectfully Submitted,



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