

**INTERMOUNTAIN GAS COMPANY**

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UTILITIES COMMISSION

October 9, 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 September 14, 2020 (Report # 1202006)

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 Pocatello District conducted July 20-21, 2020. Specifically, we are addressing how we plan to bring the probable violation into full compliance.

**PROBABLE VIOLATIONS**

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| <p><b>1. 49 CFR §192.739 (a) (4) Pressure limiting and regulating stations: Inspection and testing.</b><br/>         Pressure limiting and regulating stations: Inspection and testing – reads: <i>Properly installed and protected from dirt, liquids, or other conditions that might prevent proper operation.</i> Which is also covered in IGC Procedure 4306 Sec 4.1.1.</p> <p><b><u>Finding:</u></b><br/>         During the inspection it was noted that regulator stations 60020 (primary) had one of its regulators fail to lock up at the pre-established set point preventing proper operation. Also stations 60002 and 60007 were unable to be locked up due to irrigation pumps running.</p> |
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**Intermountain Gas Response**

IGC acknowledges the findings brought forth by the IPUC stated above. The following table was extracted from the annual inspection questions, *Regulator 1 Operated Properly* and *Regulator 2 Operated Properly*. While the results do not indicate a history of lockup failures, a white, powdery substance was identified at this location during the 2018 and 2020 annual inspections. As such, regulator station 60020 was added to the *IGC Failed to Lockup Mitigation Plan* and is currently scheduled to have pilot sulfur filtration installed in 2021.

Regulator Station	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
60020	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes

Additionally, it is identified in the IPUC findings that regulator stations 60002 and 60007 were unable to lock-up due to irrigation pumps running. The constant load of the irrigation pumps does not allow for the necessary duration of shut in to properly demonstrate lockup while the pumps are running. When tested with the irrigation pumps shut off, we are able to demonstrate lockup successfully.

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2. **49 CFR §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.*

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.*

**Finding:**

Pipeline patrol ACP827-002 and ACP 827-004 appeared to have issues with coatings and possible contact with hanger on bridge.

### **Intermountain Gas Response**

IGC acknowledges the findings brought forth by the IPUC stated above. Pipeline patrol ACP 827-002 indicated contact with a hanger and as such, the inspection interval was reduced from every 3 calendar years to not exceeding 7.5 months, but at least twice each calendar year. In addition, what initially appeared to be corrosion, was later confirmed to be coal tar wrap.

With regard to pipeline patrol ACP 827-004, while there was no contact with a hanger and no corrosion found, there were areas of paint loss at points with surface oxidation. The need to paint will be reevaluated during future inspection.

3. **49 CFR § Appendix D of Part 192 – Criteria for Cathodic Protection and determination of measurements.**

*I. Criteria for cathodic protection – A. Steel... (1) A negative (cathodic) voltage of at least 0.85 volt, with reference to a saturated copper-copper sulfate half-cell. Determination of this voltage must be made with the protective current applied, and IAW sections II and IV of this appendix.*

**Finding:**

During the inspection it was noted that at the following locations CP readings were unable to be ascertained: Casings 827-00-606 and 827-00-501. CP technician informed us that one already has a leak survey taking place and the other will be scheduled upon completion of the inspection.

### **Intermountain Gas Response**

IGC acknowledges the findings brought forth by the IPUC stated above and respectfully maintains that cathodic protection (CP) reads at casings 827-00-606 and 827-00-501 are achievable; however, both casings appear to be shorted and are being leak surveyed per company procedure. Casing 827-00-501 has not officially been diagnosed as shorted, but a leak survey took place on July 24, 2020 and will continue per company procedure until a determination can be made.

EXECUTIVE OFFICES

**INTERMOUNTAIN GAS COMPANY**

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

Respectfully Submitted,

A handwritten signature in black ink that reads "Pat Darras". The signature is written in a cursive, flowing style.

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