



## Idaho Public Utilities Commission

PO Box 83720, Boise, ID 83720-0074

**Brad Little, Governor**

**Paul Kjellander, Commissioner**  
**Kristine Raper, Commissioner**  
**Eric Anderson, Commissioner**

September 14, 2020

Report # I202006

Pat Darras  
Intermountain Gas Company  
400 N 4<sup>th</sup> St.  
Bismarck, ND 58501

Dear Mr. Darras:

On 20-21 July 2020 the Idaho Public Utilities Commission, Pipeline Safety Division, pursuant to Chapter 601 of Title 49, United States Code, conducted the field inspection of Intermountain Gas Company's (IGC) equipment in the Pocatello District.

During the inspection it was observed that some of the Idaho natural gas distribution system owned and operated by IGC was out of compliance on some items. This results in probable violations of the pipeline safety regulations Title 49, Code of Federal Regulations, Part 192. Those probable violations are listed below:

### **PROBABLE VIOLATIONS**

1. **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 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.

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 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.*

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.

**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.

**REQUESTED ACTIONS**

A reply to this correspondence, as outlined below, is required no later than 45 days from the date of this letter. Please send all documents to our office at 11331 W Chinden Blvd, Boise, Idaho 83714-1021. Be advised that all material you submit in response to this enforcement action may be a public record, subject to disclosure under Idaho's Public Records Law. See Idaho Code §§74-101 et seq.

You have a right to appear before the Pipeline Safety Division in an informal conference before October 29, 2020, at the Commission's offices at 11331 W. Chinden Blvd, Bldg 8, Ste 201-A, Boise. You have the right to present relevant documents to the Pipeline Safety Division at that conference. The Pipeline Safety Division will make available to you any evidence which indicates that you may have violated the law, and you will have the opportunity to rebut this evidence. See IDAPA 31.01.01.21-26. If you intend to request an informal conference, please contact the Pipeline Safety Division no later than October 15, 2020.

If you wish to dispute the allegations in this Notice, but do not want an informal conference, you may send the Pipeline Safety Division a written reply to this notice. This written reply must be filed with the Commission on or before October 29, 2020 and must be signed by a IGC official with authority to bind the company. The reply must include a complete statement of all relevant facts including a complete

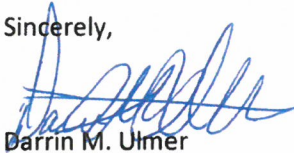
description of the corrective action(s) taken and any and all actions to be taken to prevent future failures in these areas of concern.

If you do not respond to this notice by October 29, 2020, you may be subject to statutory civil penalties and further enforcement, as allowed under Idaho law. Idaho Code §61-712A states that “[a]ny person who violates or fails to comply with, or who procures, aids or abets any violation of title 61, Idaho Code, governing safety of pipeline facilities and the transportation of gas, or of any order, decision, rule or regulation duly issued by the Idaho public utilities commission governing the safety of pipeline facilities and the transportation of gas, shall be subject to a civil penalty of not to exceed two thousand dollars (\$2,000) for each violation for each day that the violation persists. However, the maximum civil penalty shall not exceed two hundred thousand dollars (\$200,000) for any related series of violation.”

If you have any questions concerning this notice, please contact me at (208) 334-0321. Also, all written responses should be addressed to me at the above address or you may fax your response to (208) 334-4045.

We appreciate your attention to this matter and your effort to promote pipeline safety.

Sincerely,



Darrin M. Ulmer

Pipeline Safety, Program Manager  
Idaho Public Utility Commission

