

Northwest Gas Processing (NWGP)
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IDAHO PUBLIC
UTILITIES COMMISSION

Attention Mr. Darrin Ulmer and Bruce Perkins
Idaho Public Utilities Commission
11331 W. Chinden Blvd, Bldg 8, Suite 201-A
Boise, ID 83714-1021

Subject: Response to Probable Violations

July 14, 2020

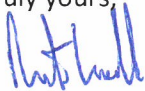
Hello Bruce and Darrin,

Enclosed/Attached please find response to your recently delivered Probable Violations. As we've discussed, due to the recent Bankruptcy filing of the previous operator of the subject line, we've had encountered issues in attempting to retrieve some of the requested data.

However, we have, and or are in the process of testing to ensure the subject issues have been addressed to ensure safety, and furthermore have every intention of maintaining compliance moving forward as the managing member of NWGP, it's facilities and gathering lines.

We appreciate your time working with us through this transition, and please do not hesitate to contact myself or Mr. Stephen Hernandez with The Compliance Group whom is helping us resolve and bring to date these issues.

Truly yours,



Nate Caldwell

July 13, 2020

Mr. Darrin M. Ulmer
Pipeline Safety, Program Manager
Idaho Public Utility Commission

Subject: Plan of Correction
Report # N202002

Dear Mr. Ulmer –

Northwest Gas Processing (NWGP) is submitting this letter to your office to update the Idaho Public Utility Commission's Pipeline Safety Division on NWGP's progress for resolution of the alleged violations from report number N202002.

Item No 1

Description: §195.605(a) Procedural manual for operations, maintenance, and emergencies.

Finding: NWGP has no evidence of readings at test points or casings occurred in 2019, other than rectifiers.

NWGP Response: NWGP cannot locate the cathodic protection test point readings in 2019. Test point readings were taken in March of 2020. There were no indications of inadequate cathodic protection during this inspection.

Item No 2

Description: §195.743(a) Pressure limiting and regulating stations: Capacity of relief devices.

Finding: NWGP has no records that the testing of relief devices in place or by review and calculations.

NWGP Response: NWGP does not have any relief devices on this pipeline. The pipeline is protected by pressure switches and shut down valves. Reviewing the capacity of the safety devices is not relevant for this system.

Item No 3

Description: §195.615(b)(2) Emergency Plans

Finding: NWGP has no records that this training has taken place

NWGP Response: NWGP will conduct an emergency training and table top or drill in 2020.

Item No 4

Description: §195.709(c) Transmission Lines: Record Keeping

Finding: NWGP has no records / evidence of Cathodic Protection readings at test points or casings occurred in 2019, other than rectifiers.

NWGP Response: NWGP cannot locate the cathodic protection test point readings in 2019. Test point readings were taken in March of 2020. There were no indications of inadequate cathodic protection during this inspection.

NWGP is committed to full compliance with the Administrations rules and appreciates your consideration in this matter.

Sincerely,

Nathan Caldwell
Operations Manager
Northwest Gas Processing