



Idaho Public Utilities Commission

PO Box 83720, Boise, ID 83720-0074

Brad Little, Governor

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

June 19, 2020

Report #N202002

Nathan Caldwell
Northwest Gas Processing
Weiser Brown Operating
117 E. Calhoun St. (Box 500)
Magnolia, AR 71753

Dear Mr. Caldwell:

On May 1st and 4th, 2020, the Idaho Public Utilities Commission, Pipeline Safety Division, pursuant to Chapter 601 of Title 49, United States Code, conducted a virtual/teleconference records inspection on the natural gas pipeline facilities (System) of Northwest Gas Processing, LLC's (NWGP) in the state of Idaho.

The inspection showed that NWGP's System in Idaho was out of compliance on certain items, resulting in probable violation of the pipeline safety regulations at Title 49, Code of Federal Regulations, Parts 192. See 49 CFR §190.207. The probable violations are as follows:

PROBABLE VIOLATIONS

1. **49 CFR §192.605(a); Procedural manual for operations, maintenance, and emergencies.**

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

49 CFR §192.465(a) External corrosion control: Monitoring

Each pipeline that is under cathodic protection must be tested at least once each calendar year, but with intervals not exceeding 15 months, to determine whether the cathodic protection meets the requirements of §192.463. However, if tests at those intervals are impractical for separately protected short sections of mains or transmission lines, not in excess of 100 feet (30 meters), or separately protected service lines, these pipelines may be surveyed on a sampling basis. At least 10 percent of these protected structures, distributed over the entire system must be surveyed each calendar year, with a different 10 percent checked each subsequent year, so that the entire system is tested in each 10-year period.

Finding:

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

2. **49 CFR §192.743(a) Pressure limiting and regulating stations: Capacity of relief devices.**

Pressure relief devices at pressure limiting stations and pressure regulating stations must have sufficient capacity to protect the facilities to which they are connected. Except as provided in §192.739(b), the capacity must be consistent with the pressure limits of §192.201(a). This capacity must be determined at intervals not exceeding 15 months, but at least once each calendar year, by testing the devices in place or by review and calculations.

Finding:

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

3. **49 CFR §192.615 (b) (2) Emergency Plans**

Train the appropriate operating personnel to assure that they are knowledgeable of the emergency procedures and verify that the training is effective.

NWGP Gas Operations & Maintenance Plan, Section 19.1 General (Training)

Periodically, Northwest shall: *Train the appropriate operating personnel to assure that they are knowledgeable of the emergency procedures and verify that training is effective.*

Finding:

NWGP has no records that this training has taken place.

4. **49 CFR §192.709 (c) Transmission Lines: Record Keeping**

A record of each patrol, survey, inspection, and test required by subparts L and M of this part must be retained for at least 5 years or until the next patrol, survey, inspection, or test is completed, whichever is longer.

NWGP Gas Operations & Maintenance Plan, Section 4.6 (3) Corrosion Control Records

Northwest shall maintain a record of each test, survey, or inspection required (in regard to corrosion control) in sufficient detail to demonstrate the adequacy of corrosion control measures or that a corrosive condition does not exist. These records must be retained for at least 5 years.

Finding:

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

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 August 3, 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 July 20, 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 August 3, 2020 and must be signed by a NWGP 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 August 3, 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