

December 22, 2020

Mr. Darrin M. Ulmer
Idaho Public Utilities Commission
11331 W Chinden Blvd., Building 8 Suite 201-A
Boise ID 83714

Re: Northwest Gas Processing, LLC (NWGP)
Pipeline Safety Division Inspection – October 1, 2020

Dear Mr. Ulmer:

We are in receipt of your October 15, 2020 letter and respectfully submit the following response to the Probable Violations:

Item No 1

Requirement: 49 CFR § 192.605(a) Procedural manual for operations, maintenance and emergencies

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

NWGP Response: The findings and corrective actions for Item Number 1 are detailed in Item Number 2 and Item Number 3 below.

Item No 2

Requirement: 49 CFR § 192.605(a) Procedural manual for operations, maintenance and emergencies

Finding: Northwest Gas Processing, LLC Gas Operations & Maintenance Plan (Sec 11.1).

11.1 Valve Security-reads: To prevent unauthorized operation, lock all emergency valves that control gas flow, excluding valves protected by some other positive type of security, such as those located within: 1. A 24-hour manned plant or facility, 2. A manned or fenced (locked) plant or facility. 3. A manned or locked building or house.) Refer to section 6.

Valve sites 1, 2, 3, 4 and Fallon well-head are not locked to prevent unauthorized operation.

NWGP Response: All valve sites mentioned above have been locked to prevent unauthorized operation. This was done by either placing a pad lock or combination lock on the valve itself or on the fencing that secures the valve site.'

Item No 3

Requirement: 49 CFR § 192.605(a) Procedural manual for operations, maintenance and emergencies

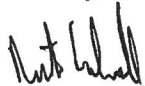
Finding: Northwest Gas Processing, LLC Operations & Maintenance Plan (Sec 8.3)
8.3 Continuing Surveillance-reads: The periodic inspections, patrols, surveys, etc. prescribed in this manual will be supplemented by routine surveillance and awareness by Northwest field personnel and/or contractors. Particular attention will be focused on physical conditions on or near a pipeline, including the following: (3) Condition of right of way and surface installations-indications of leaks; excessive vegetation; encroachment by others; cave-ins or ditch settling; warning signs; vent pipes; fences and gates; paint deterioration.

Valves sites 1, 2, 3, 4, 155, 285, 261 and Fallon well-head all had excess vegetation that needs to be removed and continually monitored. Additionally, valve sites 65 and 326 need to have carsonite markers replaced/repared and new identification stickers installed.

NWGP Response: The vegetation at the valve sites mentioned above has been removed. In the spring of 2021, Northwest Gas Processing will spray the weeds with an herbicide and monitor to ensure the vegetation stays at an acceptable height.

Northwest Gas Processing is committed to full compliance with the Idaho Public Utilities Commission's rules and appreciates your consideration in this matter. Please contact me at 870-234-3080 or Caldwell.nathan@weiser-brown.com if I can provide additional information.

Sincerely,



Nathan Caldwell
Operations Manager
NWGP