



Idaho Public Utilities Commission

PO Box 83720, Boise, ID 83720-0074

Brad Little, Governor

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

Letter of Concern

15 Oct, 2020

Report # N202003

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

Dear Mr. Caldwell:

On 1 Oct 2020, representatives of the Idaho Public Utilities Commission, Pipeline Safety, pursuant to Chapter 601 of Title 49, United States Code, conducted an onsite specialized field inspection in your Payette Idaho District.

As a result of the inspection, it appears there are area(s) of concern that do not fully meet the intent of the pipeline safety regulations Title 49, Code of Federal Regulations, Part 192 for calendar year 2020.

The item(s) listed below are of concern:

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.

2. 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.

3. Northwest Gas Processing, LLC Gas 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.*

Valve 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.

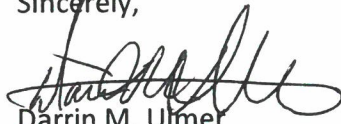
The above mentioned items were brought to the attention of your representatives during the onsite inspections. We would request that you review these matters and respond in writing within 30 days regarding the above issue including any planned corrective actions.

If you have any questions concerning this notice, please contact me at (208) 334-0321. All written responses should be addressed to me at: 11311 W Chinden Blvd, Ste 201-A, Boise, Idaho 83714 or you can fax your response to (208) 334-3762.

Because of the good faith that you have exhibited up to this time, we expect that you will take action to bring your program into compliance with pipeline safety regulations.

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