



Idaho Public Utilities Commission

PO Box 83720, Boise, ID 83720-0074

Brad Little, Governor

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

Oct 4, 2021

#D202101

Andi Shacklett
Douglas Pipeline Company
733 Washington Rd
Pittsburgh, PA 15228

Dear Ms. Shacklett:

On September 20, 2021, the Idaho Public Utilities Commission, Pipeline Safety Division, pursuant to Chapter 601 of Title 49, United States Code, conducted a field review on the natural gas pipeline facilities (System) of Douglas Pipeline Company, in the state of Idaho.

The inspection found that Douglas Pipeline Company 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 violation(s) are as follows:

PROBABLE VIOLATIONS

1. 49 CFR §192.605; Procedural manual for operations, maintenance, and emergencies.

(a) 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. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.

Douglas Gas Pipeline, Idaho Power Langley Gulch and Idaho Power Bennett Mountain Operations & Maintenance Manual, Section 14 Transmission Lines: Leak Surveys, Leak Classification States:

Note: a visual vegetation leakage survey is done in conjunction with each pipeline patrol. This visual vegetation survey is not to be considered a substitute for the annual Leakage Survey with an instrument. The leakage survey instrument used is indicated on each Leak Survey Report. The instrument used for leak detection is calibrated prior to each survey with canned methane and calibrated annually by a manufacturer-authorized technician.

Finding:

Douglas Pipeline Companies Heath DP-IR Methane Leak Detector has a calibration sticker with a 2017 date indicating that it has not been calibrated annually by a manufacturer-authorized technician as required by the operations & maintenance procedures.

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 P.O. Box 83720-0074, Boise, Idaho 83720-0074. 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 November 18, 2021, at the Commission's offices at 11331 W. Chinden Blvd, 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 Commission's order #35095, available on the PUC website: www.puc.id.us. If you intend to request an informal conference, please contact the Pipeline Safety Division no later than November 3, 2021.

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 November 18, 2021 and must be signed by a Douglas Pipeline Company 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 November 18, 2021, 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) 334-0326. 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,

Bruce Perkins
Interim Pipeline Safety, Program Manager
Idaho Public Utility Commission