

EXECUTIVE OFFICES

INTERMOUNTAIN GAS COMPANY

555 SOUTH COLE ROAD • P.O. BOX 7608 • BOISE, IDAHO 83707 • (208) 377-6000 • FAX: 377-6097

March 29, 2021

Mr. Darrin Ulmer, Programs Manager
Idaho Public Utility Commission
PO Box 83720
Boise, ID 83720-0074

Subject: Response to Notice of Probable Violation dated March 10, 2021 (Report # I202103)

Dear Mr. Ulmer,

This letter is intended to address one probable violation stemming from a March 9, 2021 Distribution Integrity Management Program (DIMP) audit of Intermountain Gas Company (IGC). Specifically, we are addressing how we plan to bring the probable violation into full compliance.

PROBABLE VIOLATION

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

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

IGC Procedure 3451.3

Section 5.2.3. Maintenance Programs states that ... Annual maintenance ensures critical system components are adequately maintained and operational as designed. Annual maintenance is performed on all regulator stations, compressor stations, and critical valves to ensure no adverse operating conditions are present. Regulator stations are checked to ensure set points are correct to achieve regulator lockup and relief set pressures are confirmed that the relief will open at desired set pressures to protect MAOP. Valves are checked annually to ensure the valve is able to open/close and lubricated/greased if needed and/or applicable.

Finding:

During field inspections within all the companies districts the PUC has found that not all regulator stations are plumbed for lockup. Therefore, the Meter inspector are unable to demonstrate that the regulators were functioning properly and were able to lock-up when the necessity arrives.

Intermountain Gas Response

IGC acknowledges the findings brought forth by the IPUC stated above. As specified in previous responses, IGC created a *Not Plumbed for Lockup Mitigation Plan*. The plan identified regulator stations that are not equipped with pressure ports to perform flow and lockup and includes a ten-year mitigation schedule.

Of the 104 regulator stations identified without pressure ports to perform lockup, IGC has retrofitted, replaced, or abandoned 37 stations to date. The remaining 67 regulator stations are scheduled to be mitigated by December 31, 2027.

Please contact Josh Sanders at (701) 222-7773 with questions or comments.

Respectfully Submitted,



Pat Darras
Vice President, Engineering & Operations Services
Intermountain Gas Company