

INTERMOUNTAIN GAS COMPANY

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

April 20, 2021

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

Subject: Response to Notice of Probable Violations dated April 12, 2021 (Report # I202104)

Dear Mr. Ulmer,

This letter is intended to address two probable violations stemming from a Records Audit of Intermountain Gas Company (IGC) conducted by the Idaho Public Utilities Commission (IPUC) March 23-24, 2021. Specifically, we are addressing how we are bringing the probable violations 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...
2. **49 CFR §192.751 (c) Prevention of accidental ignition**
(c) Post warning signs, where appropriate.

IGC Procedure 3323.1

Section 1.5 Prevention states that...Post public warning signs in order to give notice to the public that no smoking or open flames are allowed in construction or other affected areas.

Finding:

During field inspections within all the companies districts the PUC has found that not all occurrences of venting or leaking have had signage present as stated in IGC Procedure 3323.1. During the records audit there were no signs or barricades utilized per the Job Safety Analysis provided for Form 457 Report #600-008865. Therefore, records are unable to demonstrate that the Procedure was followed.

Intermountain Gas Response

IGC acknowledges the findings brought forth by the IPUC stated above. The practices detailed in standard operating procedure 3323 – *Preventing Accidental Ignition of Natural Gas* have been superseded by practices in MDU Utilities Group (MDUG) procedures, more specifically, the use of public warning signs giving notice to the public that no smoking or open flames are allowed in construction or other affected areas.

MDUG procedure *OPS 603 – Pipeline Purging and Cleaning* provides instruction to remove potential sources of ignition from the area when venting a potentially hazardous amount of natural gas into open air and allows for the use of warning signs when appropriate. Additionally, the industry best practice for protecting the general public is to establish a safety perimeter. MDUG procedure *OPS 613 – Gas Emergency Response Plan* defines a safety perimeter as a boundary created to keep the general public from entering a potentially hazardous area. Establishing, monitoring, and adjusting the safety perimeter and removing potential sources of ignition are requirements detailed throughout OPS 613. As such, IGC has initiated an MOC to retire standard operating procedure 3323 – *Preventing Accidental Ignition of Natural Gas* to eliminate areas of overlap in operational guidance.

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

EXECUTIVE OFFICES

INTERMOUNTAIN GAS COMPANY

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Respectfully Submitted,

A handwritten signature in black ink that reads "Pat Darras". The signature is written in a cursive, flowing style.

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