

EXECUTIVE OFFICES

## INTERMOUNTAIN GAS COMPANY

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June 2, 2021

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

Subject: Response to Area of Concern dated May 6, 2021 (Report # I202105)

Dear Mr. Ulmer,

This letter is intended to address one area of concern stemming from a May 3-5, 2021 field audit in Intermountain Gas Company's (IGC) Boise District.

### **AREA OF CONCERN**

**1. 49 CFR §192.199 Requirements for design of pressure relief and limiting devices.**

(e) Have discharge stacks, vents, or outlet ports designed to prevent accumulation of water, ice, or snow, located where gas can be discharged into the atmosphere without undue hazard;

**Finding:**

During the inspection it was noted that Regulator station #40090 relief stack is directly below overhead power lines which could result in an undue hazard if it were to vent during an overpressure event. Please see attached photos of this concern.

### **Intermountain Gas Response**

IGC acknowledges the findings brought forth by the IPUC stated above and as such, requested a review from MDU Utilities Group (MDUG) Electric Distribution Services regarding the location of the relief stack at Regulator Station #40090 and the hazard potential involved with the overhead power lines. MDUG Electric Distribution Services determined that there is no undue hazard resulting from the location of the relief stack in relation to the power lines; however, IGC is committed to enhancing safety features at this station such as crash protection and mitigating exposed sensing lines. Boise District Field Operations is currently working with a fencing contractor on advanced protection options.

Additionally, IGC has been actively pursuing the relocation of Regulator Station #40090 since 2017 but has been unsuccessful in obtaining additional land for use. This will remain a priority for IGC and the Boise District.

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

Respectfully Submitted,



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