

EXECUTIVE OFFICES

INTERMOUNTAIN GAS COMPANY

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

June 10, 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 May 13, 2021 (Report # I202106)

Dear Mr. Ulmer,

This letter is intended to address one probable violation stemming from a new construction inspection conducted by the Idaho Public Utilities Commission (IPUC) on April 26, 2021 at 3637 North 3500 East in Kimberly, Idaho in Intermountain Gas Company's (IGC) Twin Falls District.

PROBABLE VIOLATION

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.

Finding(s):

During the inspection it was noted that:

- Procedure(s) as required by SF 422 were not followed: Section(s) 1, 2 and 5.
- Procedure(s) as required by SF418 were not followed: Section(s) 6.
- Backhoe excavation was within 6" of the in service main prior to it being located by hand digging.

Intermountain Gas Response

Intermountain Gas Company (IGC) respectfully requests additional information regarding the findings related to SF 422 – Job Safety Analysis/Tailgate Meetings and SF 418 – Working in Excavations, specifically, which procedural steps were not followed. While some Contractors have chosen to utilize a Job Safety Analysis (JSA) form when performing work for IGC, Contractors are not included in the scope of SF 422 and therefore, are not bound by the requirements set forth in the policy. As an alternative, per SF 418, it is the responsibility of the Contractor to establish and maintain a safe worksite and correct any deficiencies that arise.

IGC agrees that KV Inc. was in violation of Title 55, Chapter 22 Underground Facilities Damage Prevention 55-2207 (2)(a) determine by hand digging, in the area twenty-four (24) inches or less from the facilities, the precise actual location of underground facilities which have been marked. As such, IGC Field Operations management will remind IGC Contractors of the requirement to use reasonable care to avoid damaging underground facilities and to adhere to the Idaho Underground Facilities Damage Prevention law 55-2205 (2)(a).

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

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