



# Idaho Public Utilities Commission

PO Box 83720, Boise, ID 83720-0074

Brad Little, Governor

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

August 30, 2021

#N202101

Nathan Caldwell  
Northwest Gas Processing  
Weiser Brown Operating  
117 E. Calhoun St. (Box 500)  
Magnolia, AR 71753

Dear Mr. Caldwell:

On August 23-25, 2021, the Idaho Public Utilities Commission, Pipeline Safety Division, pursuant to Chapter 601 of Title 49, United States Code, conducted a records inspection and field review on the natural gas pipeline facilities (System) of Northwest Gas Processing, LLC's (NWGP) in the state of Idaho.

The inspection found that NWGP's 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 violations are as follows:

## **PROBABLE VIOLATIONS**

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

*(b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.*

*(8) Periodically reviewing the work done by operator personnel to determine the effectiveness, and adequacy of the procedures used in normal operation and maintenance and modifying the procedures when deficiencies are found.*

**NWGP Gas Operations & Maintenance Plan, Section 1.9 Review of Personnel Performance 192.605 (b) (8)(c)(4)**

*Northwest will periodically review the performance of normal operations & maintenance procedures conducted by Northwest personnel and/or contractors to determine the effectiveness of the procedures. If applicable, their response to abnormal operations, safety related conditions, and emergencies will also be reviewed. If any deficiencies are identified corrective action will be taken immediately*

*Periodically: Recommended in combination with Operator Qualification evaluations, after the occurrence of any AOC, SRC, or emergency, and anytime significant procedures within this manual are changed. The reviewer shall utilize a minimum of one (1) site specific procedure and utilize any of the methods listed below to conduct the review: • Observing performance of the procedure • Conducting a mock drill • Individual or group “classroom” training • Tabletop discussion • Regulatory pre-audits • During regulatory agency audits • Review of operations & maintenance documentation • In combination with OQ evaluations • Other methods that prove to be effective*

*Form - 26 can be used to document this review. However, depending on which method from above is utilized, an alternate documentation method may be more logical (e.g., OQ records, audit checklist, training log, etc.) Modifications to procedures shall be made as appropriate and a Management of Change (MOC) shall be documented and distributed to all applicable personnel in accordance with the internal Northwest MOC process.*

**Finding:**

NWGP has no record of periodic reviews done by operator personnel of normal operations & maintenance procedures to determine the effectiveness of the procedures or that they are being documented on a Form 26 or alternate method as required by their O&M procedures.

**2. 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.*

**NWGP Gas Operations & Maintenance Plan, Section 9.5 Pressure Relief & Limiting Device Design 192.199, .201**

*General Procedures*

*Each pressure relief or regulating device will be designed and sized to ensure that it has sufficient capacity to relieve the system from over pressuring.*

*Special attention will be given to compressor stations and other stations where the failure of any equipment could cause abnormal flows resulting in pressure build up. The design of these devices will be made for each system based on individual operating conditions.*

*A part of daily maintenance shall include insuring that all pressure relief devices are protected from accumulation of dirt, moisture, etc. that may hinder operation.*

*All pressure relief valves shall be checked for pressure setting and operability in accordance with 49 CFR 192. Any malfunction detected shall be cause for immediate replacement or repairs. If it is not practical to test a relief valve in place, it shall be replaced with one that has been set and tested at off-site facilities.*

*Reports of above inspections and tests shall be documented on Form – 4 and retained in the operations file*

**Finding:**

NWGP has not documented the above inspections on Form-4 as required by their O&M procedures.

**3. 49 CFR §192.706 Corrosion Control Records.**

*(a) Each operator shall maintain records or maps to show the location of cathodically protected piping, cathodic protection facilities, galvanic anodes, and neighboring structures bonded to the cathodic protection system. Records or maps showing a stated number of anodes, installed in a stated manner or spacing, need not show specific distances to each buried anode.*

*(b) Each record or map required by paragraph (a) of this section must be retained for as long as the pipeline remains in service.*

*(c) Each operator shall maintain a record of each test, survey, or inspection required by this subpart in sufficient detail to demonstrate the adequacy of corrosion control measures or that a corrosive condition does not exist. These records must be retained for at least 5 years, except that records related to §§192.465 (a) and (e) and 192.475(b) must be retained for as long as the pipeline remains in service.*

**NWGP Gas Operations & Maintenance Plan, Section 10.7 Rectifier Inspections**  
**192.45(b)**

*Meter reading procedures- After the rectifier unit has been visually inspected, the rectifier's output (volts and amperes) must then be measured and recorded on the Rectifier Inspection Form. All rectifier readings must be taken using an approved multimeter to verify the rectifier's meter readings and/or to adjust the output*

**Finding:**

NWGP personnel were not recording the voltmeter readings correctly as required by their O&M procedures.

**4. 49 CFR §192.63 Marking of materials.**

*(a) Except as provided in paragraph (d) and (e) of this section, each valve, fitting, length of pipe, and other component must be marked as prescribed in the specification or standard to which it was manufactured.*

*(b) Surfaces of pipe and components that are subject to stress from internal pressure may not be field die stamped.*

*(c) If any item is marked by die stamping, the die must have blunt or rounded edges that will minimize stress concentrations.*

*(d) Paragraph (a) of this section does not apply to items manufactured before November 12, 1970, that meet all of the following:*

*(1) The item is identifiable as to type, manufacturer, and model.*

*(2) Specifications or standards giving pressure, temperature, and other appropriate criteria for the use of items are readily available.*

**Finding:**

NWGP personnel could not show where this requirement is in their O&M 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 October 14, 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](http://www.puc.id.us). If you intend to request an informal conference, please contact the Pipeline Safety Division no later than October 1, 2021.

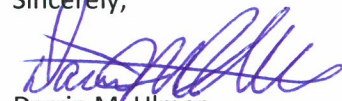
If you wish to dispute the allegations in this Notice, but do not want an informal conference, you may send the Pipeline Safety Division a written reply to this notice. This written reply must be filed with the Commission on or before October 14, 2021 and must be signed by a NWGP official with authority 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 October 14, 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) 334-0321. 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,



Darrin M. Ulmer

Pipeline Safety, Program Manager  
Idaho Public Utility Commission