

EXECUTIVE OFFICES

**INTERMOUNTAIN GAS COMPANY**

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

April 29, 2022

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

Subject: Response to Notice of Probable Violation dated March 17, 2022 (Report # I202201)

Dear Mr. Brooks,

This letter is intended to address one probable violation stemming from a field inspection conducted by the Idaho Public Utilities Commission (IPUC) on March 14-16, 2022, in Intermountain Gas Company's (IGC) Nampa District.

**PROBABLE VIOLATION**

1. **49 CFR §192.739 (a) (4) Pressure limiting and regulating stations: Inspection and testing.** Pressure limiting and regulating stations: Inspection and testing - reads: *Properly installed and protected from dirt, liquids, or other conditions that might prevent proper operation.* Which is also covered in IGC OPS 500 Sec. 4.1.

**Finding(s):**

During the inspection it was noted that:

- Regulator stations 48325-RS-60738, 48321-RS-59930, 48321-RS-59936, 48318-RS-59839, 48267-RS-59881, 48363-RS-59887 had one or both regulators fail to lock up at the pre-established set point preventing proper operation.

**Intermountain Gas Response**

Intermountain Gas Company (IGC) acknowledges the findings brought forth by the Idaho Public Utilities Commission on five of the six regulator stations. The regulator station listed as 48318-RS-59839 appears to be in error. IGC information has the regulator station inspected during the March 14-16, 2022, inspection as regulator station 48267-RS-59849. As stated in previous responses, IGC created a Failed to Lockup Mitigation Plan that includes the following:

- Identification of regulator station regulators that failed a lockup test two or more times during calendar years 2016-2018.
- Review of the identified stations for an appropriate mitigation option: monitor, rebuild, pilot sulfur heat, pilot heat, stainless steel stems for pilots, line heater, or strainers.
- Creation of a ten-year schedule based on a consequence of failure rating.

IGC used the criteria of two or more failed lock up tests in a three-year period (2020-2022) to evaluate the need to add the regulator stations referenced in the inspection to the Failed Lock up Mitigation Plan. The following table was extracted from the annual inspection questions, Regulator 1 Operated Properly and Regulator 2 Operated Properly.

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Maximo ID	Station Number	2020 Reg 1	2020 Reg 2	2021 Reg 1	2021 Reg 2	2022 Reg 1	2022 Reg 2	Add to Plan
48325-RS-60738	30077	YES	YES	NO	YES	NO	YES	Currently on mitigaion plan
48321-RS-59930	30112	YES	YES	YES	YES	NO	YES	NO
48321-RS-59936	30113	YES	YES	NO	YES	NO	YES	YES
48363-RS-59887	30125	YES	YES	YES	YES	NO	YES	Currently on mitigaion plan
48267-RS-59849	30163	NO	YES	YES	YES	NO	YES	YES
48267-RS-59881	30167	YES	YES	NO	YES	NO	YES	YES

Based on the results, three of the stations identified with lock up failures in 2022, 48321-RS-59936, 48267-RS-59849 and 48267-RS-59881 will be added to the Failed Lock up Mitigation Plan. Regulator stations 48325-RS-60738 and 48363-RS-59887 are currently included in the Failed Lock up Mitigation plan. The information from the latest inspections will also be used to determine if the remediations for the regulator stations currently on the plan are appropriate, or if a change to the remediation plan is needed. Station 48321-RS-59930 will not be added to the Failed Lock up Mitigation Plan based on its 2020-2022 annual inspection results because the regulator was repaired after the failed lock up that occurred during the March 14-16, 2022, inspection and has not met the criteria of failing lock two times in a three year period.

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

Respectfully Submitted,



Pat Darras

Vice President, Engineering & Operations Services  
Intermountain Gas Company