

INTERMOUNTAIN GAS COMPANY

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

December 13, 2022

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

Subject: Response to Notice of Probable Violations dated October 31, 2022 (Report # I202204)

Dear Mr. Brooks,

This letter is intended to address fourteen (14) probable violations stemming from a Procedural, Records, and Field Inspection of Intermountain Gas Company's (IGC) Rexburg LNG Plant conducted by the Idaho Public Utilities Commission (IPUC) on October 3-6, 2022.

PROBABLE VIOLATIONS

1. 49 CFR §193.2507 Monitoring Operations

Each component in operation or building in which a hazard to persons or property could exist must be monitored to detect fire or any malfunction or flammable fluid that could cause a hazardous condition. Monitoring must be accomplished by watching or listening from an attended control center for warning alarms, such as gas, temperature, pressure, vacuum, and flow alarms, or by conducting an inspection or test at intervals specified in the operating procedures.

49 CFR §193.2801 Fire Protection

Each operator must provide and maintain fire protection at LNG plants according to sections 9.1 through 9.7 and section 9.9 of NFPA-59A-2001 (incorporated by reference, see § 193.2013). However, LNG plants existing on March 31, 2000, need not comply with provisions on emergency shutdown systems, water delivery systems, detection systems, and personnel qualification and training until September 12, 2005.

NFPA 59A Standard for the Production, Storage, and Handling of Liquefied Natural Gas (LNG) 2001 Edition.

9.3 Fire and Leak Control.

9.3.1 *Those areas including enclosed buildings, that have the potential for flammable gas concentrations, LNG or flammable refrigerant spills, and fire shall be monitored as required by the evaluations in 9.1.2.*

9.3.2 *Continuously monitored low-temperature sensors or flammable gas detection systems shall sound an alarm at the plant site and at a constantly attended location if the plant site is not attended continuously.*

9.3.3 *Fire detectors shall sound an alarm at the plant site and at a constantly attended location if the plant site is not attended continuously. In addition, as so determined by an evaluation in accordance with 9.1.2, fire detectors shall be permitted to activate portions of the ESD system.*

9.3.4 *The detection systems determined from the evaluation in 9.1.2 shall be designed, installed, and maintained in accordance with NFPA 72, National Fire Alarm Code, or NFOA 1221, Standard for the Installation, Maintenance, and Use of Emergency Services Communications Systems, as applicable.*

Findings:

Staff observed that the calibration gas used to test the Lower Explosive Limit (LEL) detection alarm had an expiration date of 2014, rendering the tests on the LEL alarm invalid. Additionally, when tested, audible and strobe warning alarms were not working because they were disconnected from the main control box.

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Intermountain Gas Response

Intermountain Gas Company (IGC) acknowledges the findings brought forth by the IPUC as outlined above. The expired calibration gas has been replaced with new calibration gas, and the LEL sensors were calibrated on November 29, 2022. Future calibrations will be performed at the required intervals outlined in procedure 4555 Rexburg LNG Equipment and Components, and calibration gas will be replaced prior to expiration.

Additionally, the audible and strobe warning alarms were reconnected and tested during the audit. The testing of the audible alarm was successful, and the alarm remains connected and in working condition. After investigation, it was determined the light within the strobe light alarm is burnt out. The fire panel company, Simplex-Grinnell, has been contacted for repairs. While a repair date has not been confirmed, IGC has requested the repairs be made as soon as possible.

2. 49 CFR §193.2801 Fire Protection

Each operator must provide and maintain fire protection at LNG plants according to sections 9.1 through 9.7 and section 9.9 of NFPA-59A-2001 (incorporated by reference, see §193.2013). However, LNG plants existing on March 31, 2000, need not comply with provisions on emergency shutdown systems, water delivery systems, detection systems, and personnel qualification and training until September 12, 2005.

NFPA 59A Standard for the Production, Storage, and Handling of Liquefied Natural Gas (LNG) 2001 Edition.

9.7 Personnel Safety

9.7.4**At least three portable flammable gas indicators shall be readily available.*

Findings:

Staff found that there was only one portable flammable gas detector at the LNG site, and it was in the service technician's truck.

Intermountain Gas Response

Intermountain Gas Company (IGC) acknowledges the findings brought forth by the IPUC as outlined above. To meet the requirements NFPA 59 A section 9.7.4, IGC placed an order on December 7, 2022, for the purchase of two portable gas detectors that will be permanently stored at the Rexburg LNG facility, bringing the number of portable gas detectors to three.

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3. **49 CFR §193.2017 Plans and Procedures**

(a) Each operator shall maintain at each LNG plant the plans and procedures required for that plant by this part. The plans and procedures must be available upon request for review and inspection by the Administrator or any State Agency that has submitted a current certification or agreement with respect to the plant under the pipeline safety laws (49 U.S.C. 60101 et seq.). In addition, each change to the plans or procedures must be available at the LNG plant for review and inspection within 20 days after the change is made.

49 CFR §193.2605 Maintenance procedures

(c) Each operator shall include in the manual required by paragraph (b) of this section instructions enabling personnel who perform operation and maintenance activities to recognize conditions that potentially may be safety-related conditions that are subject to the reporting requirements of §191.23 of this subchapter.

Finding:

Staff found that the Operating Manual for the Rexburg LNG plant does not have a procedure enabling personnel who perform operation and maintenance activities to recognize conditions that potentially may be safety-related conditions.

Intermountain Gas Response

Intermountain Gas Company (IGC) acknowledges the Rexburg LNG operating manual does not outline the requirements related to safety related conditions, however; MDU Utilities Group procedure *OPS 9 – Gas Emergency Notification and Reporting* outlines the requirements set forth in 49 CFR §191.23. An MOC has been initiated to create a new procedure to be added to the operating manual that will reference *OPS 9*. The new procedure will implement on or before January 31, 2023.

4. **49 CFR §193.2017 Plans and Procedures**

(b) Each operator shall maintain at each LNG plant the plans and procedures required for that plant by this part. The plans and procedures must be available upon request for review and inspection by the Administrator or any State Agency that has submitted a current certification or agreement with respect to the plant under the pipeline safety laws (49 U.S.C. 60101 et seq.). In addition, each change to the plans or procedures must be available at the LNG plant for review and inspection within 20 days after the change is made.

49 CFR §193.2607 Foreign Material

(a) The presence of foreign material, contaminants, or ice shall be avoided or controlled to maintain the operational safety of each component.

(b) LNG plant grounds must be free from rubbish, debris, and other material which present a fire hazard. Grass areas on the LNG plant grounds must be maintained in a manner that does not present a fire hazard.

Findings:

Staff found that the Operating Manual for the Rexburg LNG plant does not require that the facility be free from the presence of foreign material and debris.

Intermountain Gas Response

Intermountain Gas Company (IGC) acknowledges the findings brought forth by the IPUC as outlined above. An MOC has been initiated to revise procedure *4552 Rexburg LNG Recognizing Abnormal Operating Conditions* to include the requirement of the recognition and removal of foreign material and debris. The revised procedure will implement on or before January 31, 2023.

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5. **49 CFR §193.2017 Plans and Procedures**

(c) Each operator shall maintain at each LNG plant the plans and procedures required for that plant by this part. The plans and procedures must be available upon request for review and inspection by the Administrator or any State Agency that has submitted a current certification or agreement with respect to the plant under the pipeline safety laws (49 U.S.C. 60101 et seq.). In addition, each change to the plans or procedures must be available at the LNG plant for review and inspection within 20 days after the change is made.

49 CFR §193.2801 Fire Protection

Each operator must provide and maintain fire protection at LNG plants according to sections 9.1 through 9.7 and section 9.9 of NFPA-59A-2001 (incorporated by reference, see §193.2013). However, LNG plants existing on March 31, 2000, need not comply with provisions on emergency shutdown systems, water delivery systems, detection systems, and personnel qualification and training until September 12, 2005.

NFPA 59A Standard for the Production, Storage, and Handling of Liquefied Natural Gas (LNG) 2001 Edition.

9.9 Other Operations

9.9.1 Manual emergency depressurizing means shall be provided where necessary for safety. Portions of the plant that can be isolated from storage tanks or other sources of supply can be depressurized by venting to the atmosphere. The discharge shall be directed so as to minimize exposure to personnel or equipment.

Findings:

Staff found that the Operating Manual for the Rexburg LNG plant does not have a procedure for manually depressurizing the plant or venting LNG in the event of an emergency as necessary for safety.

Intermountain Gas Response

Intermountain Gas Company (IGC) acknowledges the findings brought forth by the IPUC as outlined above. An MOC has been initiated to revise procedure 4552 *Rexburg LNG Recognizing Abnormal Operating Conditions* to include the instruction for venting in the case of an emergency. The revised procedure will implement on or before January 31, 2023.

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6. 49 CFR §193.2513 Transfer Procedures

- (a) *Each transfer of LNG or other hazardous fluid must be conducted in accordance with one or more manuals of written procedures to provide for safe transfers*
- (b) *The transfer procedures must include provisions for personnel to:*
 - (1) *Before transfer, verify that the transfer system is ready for use, with connections and controls in proper positions, including if the system could contain a combustible mixture, verifying that it has been adequately purged in accordance with a procedure which meets the requirements of "Purging Principles and Practices (incorporated by reference, see §193.2013)";*
 - (2) *Before transfer, verify that each receiving container or tank vehicle does not contain any substance that would be incompatible with the incoming fluid and that there is sufficient capacity available to receive the amount of fluid to be transferred;*
 - (3) *Before transfer, verify the maximum filling volume of each receiving container or tank vehicle to ensure that expansion of the incoming fluid due to warming will not result in overfilling or overpressure;*
 - (4) *When making bulk transfer of LNG into a partially filled (excluding cooldown heel) container, determine any differences in temperature or specific gravity between the LNG being transferred and the LNG already in the container and, if necessary, provide a means to prevent rollover due to stratification.*
 - (5) *Verify that the transfer operations are proceeding within design conditions and that overpressure or overfilling does not occur by monitoring applicable flow rates, liquid levels, and vapor returns.*
 - (6) *Manually terminate the flow before overfilling or overpressure occurs; and,*
 - (7) *Deactivate cargo transfer systems in a safe manner by depressurizing, venting, and disconnecting lines and conducting any other appropriate operations.*

IGC – Rexburg LNG Transfer Operations – Procedure 4565.2 Revision April 22, 2021

3.3.14. Complete necessary items on LNG Transfer Operations Checklist prior to beginning transfer operations.

3.6.4. Ensure LNG Transfer Operations Checklist is complete, signed and dated by a Vap. Tech.

3.6.4.1. A separate checklist is required for each trailer offload.

Findings:

Staff found that the Operator did not utilize Rexburg LNG Truck Off Loading Operations Checklist as required by IGC procedure 4565.2.

Intermountain Gas Response

Intermountain Gas Company (IGC) acknowledges the findings brought forth by the IPUC as outlined above. Operators will immediately begin using the Rexburg LNG Truck Off Loading Operations Checklist as required by procedure 4565 Rexburg LNG Transfer Operations.

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7. 49 CFR §193.2639 Maintenance Records (a)

(a) Each operator shall keep a record at each LNG plant of the date and type of each maintenance activity performed on each component to meet the requirements of this part. For each LNG facility that is designed and constructed after March 31, 2000 the operator shall also maintain related periodic inspection and testing records that NFPA-59A-2001 (incorporated by reference, see § 193.2013) requires. Maintenance records, whether required by this part or NFPA-59A-2001 must be kept for a period of not less than five years.

49 CFR §193.2621 Testing transfer hoses

*(a) Tested once each calendar year, but with intervals not exceeding 15 months, to the maximum pump pressure or relief valve setting; and
(b) Visually inspected for damage or defects before each use*

IGC – Rexburg LNG Transfer Operations – Procedure 4565.2 Revision April 22, 2021

3.3.14. Complete necessary items on LNG Transfer Operations Checklist prior to beginning transfer operations.

3.6.4. Ensure LNG Transfer Operations Checklist is complete, signed and dated by a Vap. Tech.

3.6.4.1. A separate checklist is required for each trailer offload.

Findings:

Staff did not find records of transfer hose inspections being completed or recorded for each trailer as required by 49 CFR 193.2639 Maintenance Records, 49 CFR 193.2621 Testing Transfer Hoses, and IGC – Rexburg LNG Transfer Operations – Procedure 4565.2 Revision April 22, 2021 Section 3.6.4.1.

Intermountain Gas Response

Intermountain Gas Company (IGC) acknowledges the findings brought forth by the IPUC as outlined above. Operators will immediately begin using the Rexburg LNG Truck Off Loading Operations Checklist as required by procedure 4565 Rexburg LNG Transfer Operations.

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8. 49 CFR §193.2719 Training: records.

- (a) *Each operator shall maintain a system of records which-*
- (1) *Provide evidence that the training programs required by this subpart have been implemented; and*
 - (2) *Provide evidence that personnel have undergone and satisfactorily completed the required training programs.*

49 CFR §193.2707 Operations and maintenance.

- (a) *Each operator shall utilize for operation or maintenance of components only those personnel who have demonstrated their capability to perform their assigned functions by-*
- (1) *Successful completion of the training required by §§193.2713 and 193.2717;*
 - (2) *Experience related to the assigned operation or maintenance function; and,*
 - (3) *Acceptable performance on a proficiency test relevant to the assigned function.*

49 CFR §193.2713 Training, operations and maintenance.

- (a) *Each operator shall provide and implement a written plan of initial training to instruct-*
- (1) *All permanent maintenance, operating, and supervisory personnel-*
 - (i) *About the characteristics and hazards of LNG and other flammable fluids used or handled at the facility, including, with regard to LNG, low temperatures, flammability of mixtures with air, odorless vapor, boiloff characteristics, and reaction to water and water spray;*
 - (ii) *About the potential hazards involved in operating and maintenance activities; and,*
 - (iii) *To carry out aspects of the operating and maintenance procedures under §§193.2503 and 193.2605 that relate to their assigned functions; and*
 - (2) *All personnel-*
 - (i) *To carry out the emergency procedures under §193.2509 that relate to their assigned functions; and*
 - (ii) *To give first-aid; and,*
 - (3) *All operating and appropriate supervisory personnel-*
 - (i) *To understand detailed instructions on the facility operations, including controls, functions, and operating procedures; and*
 - (ii) *To understand the LNG transfer procedures provided under §193.2513.*

Findings:

Staff did not find any written plan of initial training, nor any records of initial training.

Intermountain Gas Response

Intermountain Gas Company (IGC) acknowledges the findings brought forth by the IPUC as outlined above.

While on the job training has been conducted for personnel assigned LNG duties, an official training plan is being developed for the initial training of permanent maintenance, operating, and supervisory personnel. Initial training for required personnel will be completed on or before March 31, 2023, utilizing the new training plan. Training records will be retained for the duration an individual is assigned LNG responsibilities, plus one year after the individual is no longer assigned responsibilities.

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9. 49 CFR §193.2719 Training: records.

(a) Each operator shall maintain a system of records which-

- (1) Provide evidence that the training programs required by this subpart have been implemented; and*
- (2) Provide evidence that personnel have undergone and satisfactorily completed the required training programs.*

49 CFR §193.2713 Training: operations and maintenance

(b) A written plan of continuing instructions must be conducted at intervals of not more than two years to keep all personnel current on the knowledge and skills they gained in the program of initial instruction.

Findings:

Staff did not find any written plan of continuing instruction, nor any records of two-year refresher training.

Intermountain Gas Response

Intermountain Gas Company (IGC) acknowledges the findings brought forth by the IPUC as outlined above. While on the job training has been conducted for personnel assigned LNG duties, an official training plan is being developed for the initial training of permanent maintenance, operating, and supervisory personnel. Initial training for required personnel will be completed on or before March 31, 2023, utilizing the new training plan. Refresher training will be conducted at intervals not to exceed two years per the requirement of *4557 Rexburg LNG Vaporization Tech Training and Qualifications*. Training records will be retained for the duration an individual is assigned LNG responsibilities, plus one year after the individual is no longer assigned responsibilities.

10. 49 CFR §193.2715 Training, security.

(a) Personnel responsible for security at an LNG plant must be trained in accordance with a written plan of initial instruction to:

- (1) Recognize breaches of security;*
- (2) Carry out the security procedures under §193.2903 that relate to their assigned duties;*
- (3) Be familiar with basic plant operations and emergency procedures, as necessary to effectively perform their assigned duties; and,*
- (4) Recognize conditions where security assistance is needed.*

49 CFR §193.2719 Training: records.

(a) Each operator shall maintain a system of records which-

- (1) Provide evidence that the training programs required by this subpart have been implemented; and*
- (2) Provide evidence that personnel have undergone and satisfactorily completed the required training programs.*

Findings:

Staff did not find any written plan of initial training, nor any records of initial training.

Intermountain Gas Response

Intermountain Gas Company (IGC) acknowledges the findings brought forth by the IPUC as outlined above. While on the job training has been conducted for personnel assigned LNG duties, an official training plan is being developed for the initial training of permanent maintenance, operating, and supervisory personnel. Initial training for required personnel will be completed on or before March 31, 2023, utilizing the new training plan. Training records will be retained for the duration an individual is assigned LNG responsibilities, plus one year after the individual is no longer assigned responsibilities.

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11. 49 CFR §193.2715 Training, security.

(a) Personnel responsible for security at an LNG plant must be trained in accordance with a written plan of initial instruction to:

- (1) Recognize breaches of security;*
- (2) Carry out the security procedures under §193.2903 that relate to their assigned duties;*
- (3) Be familiar with basic plant operations and emergency procedures, as necessary to effectively perform their assigned duties; and,*
- (4) Recognize conditions where security assistance is needed.*

(b) A written plan of continuing instruction must be conducted at intervals of not more than 2 years to keep all personnel having security duties current on the knowledge and skills they gained in the program of initial instruction.

§ 193.2719 Training, records.

(a) Each operator shall maintain a system of records which-

- (1) Provide evidence that the training programs required by this subpart have been implemented; and*
- (2) Provide evidence that personnel have undergone and satisfactorily completed the required training programs.*

Findings:

Staff did not find any written plan of continuing instruction, nor any records of two-year refresher training.

Intermountain Gas Response

Intermountain Gas Company (IGC) acknowledges the findings brought forth by the IPUC as outlined above. While on the job training has been conducted for personnel assigned LNG duties, an official training plan is being developed for the initial training of permanent maintenance, operating, and supervisory personnel. Initial training for required personnel will be completed on or before March 31, 2023, utilizing the new training plan. Refresher training will be conducted at intervals not to exceed two years per the requirements of *4557 Rexburg LNG Vaporization Tech Training and Qualifications*. Training records will be retained for the duration an individual is assigned LNG responsibilities, plus one year after the individual is no longer assigned responsibilities.

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12. 49 CFR §193.2717 Training, fire protection.

(a) All personnel involved in maintenance and operations of an LNG plant, including their immediate supervisors, must be trained according to a written plan of initial instruction, including plant fire drills, to:

- (1) Know the potential causes and areas of fire;
- (2) Know the types, sizes, and predictable consequences of fire; and
- (3) Know and be able to perform their assigned fire control duties according to the procedures established under § 193.2509 and by proper use of equipment provided under § 193.2801.

(c) Plant fire drills must provide personnel hands-on experience in carrying out their duties under the fire emergency procedures required by § 193.2509

§ 193.2719 Training: records.

(a) Each operator shall maintain a system of records which-

- (1) Provide evidence that the training programs required by this subpart have been implemented; and
- (2) Provide evidence that personnel have undergone and satisfactorily completed the required training programs.

Findings:

Staff did not find any written plan of initial training, nor any records of initial training.

Intermountain Gas Response

Intermountain Gas Company (IGC) acknowledges the findings brought forth by the IPUC as outlined above. A training plan is being developed for the initial training of permanent maintenance, operating, and supervisory personnel. Initial training for required personnel will be completed on or before March 31, 2023. Training records will be retained for the duration an individual is assigned LNG responsibilities, plus one year after the individual is no longer assigned responsibilities.

13. 49 CFR §193.2717 Training, fire protection.

(a) All personnel involved in maintenance and operations of an LNG plant, including their immediate supervisors, must be trained according to a written plan of initial instruction, including plant fire drills, to:

- (1) Know the potential causes and areas of fire;
- (2) Know the types, sizes, and predictable consequences of fire; and
- (3) Know and be able to perform their assigned fire control duties according to the procedures established under §193.2509 and by proper use of equipment provided under §193.2801.

(b) A written plan of continuing instruction, including plant fire drills, must be conducted at intervals of not more than 2 years to keep personnel current on the knowledge and skills they gained in the instruction under paragraph (a) of this section.

(c) Plant fire drills must provide personnel hands-on experience in carrying out their duties under the fire emergency procedures required by §193.2509

§ 193.2719 Training, records (a)

(a) Each operator shall maintain a system of records which-

- (1) Provide evidence that the training programs required by this subpart have been implemented; and
- (2) Provide evidence that personnel have undergone and satisfactorily completed the required training programs.

Findings:

Staff did not find any written plan of continuing instruction, nor any records of two-year refresher training.

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Intermountain Gas Response

Intermountain Gas Company (IGC) acknowledges the findings brought forth by the IPUC as outlined above. A training plan is being developed for the initial training of permanent maintenance, operating, and supervisory personnel. Initial training for required personnel will be completed on or before March 31, 2023. Refresher training will be conducted at intervals not to exceed two years per the requirement of *4557 Rexburg LNG Vaporization Tech Training and Qualifications*.

14. 49 CFR §193.2503 Operating procedures.

Each operator shall follow one or more manuals of written procedures to provide safety in normal operation and in responding to an abnormal operation that would affect safety.

IGC – Rexburg LNG Equipment and Components – Procedure 4555.4 Revision April 22, 2021

2. PROCEDURE

2.1. All combustible gas detectors shall be inspected and tested at intervals not to exceed six (6) months and repaired/replaced per manufacturer's recommendations if needed.

Issue Summary:

Intermountain Gas Company Standard Operating Procedure 4555.4 (2.1) requires all LEL combustible gas indicators shall be inspected and tested at intervals not to exceed six (6) months and repaired/replaced per manufacturer's recommendations if needed. When reviewing records, it was documented testing took place in May 2021 and November 2021 but was not completed in May 2022 as required by procedure 4555.4.

Intermountain Gas Response

Intermountain Gas Company (IGC) acknowledges the findings brought forth by the IPUC as outlined above. LEL sensors were calibrated on November 29, 2022. Future calibrations will be performed at the required intervals outlined in *4555 Rexburg LNG Equipment and Components*.

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

Respectfully Submitted,



Pat Darras

Vice President, Engineering & Operations Services
Intermountain Gas Company