

INTERMOUNTAIN GAS COMPANY

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

November 21, 2021

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

Subject: Response to Areas of Concern dated October 31, 2022 (Report # I202205)

Dear Mr. Brooks,

This letter is intended to address six (6) areas of concern 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.

ITEMS OF CONCERN

1. 49 CFR §191.15 Transmission systems; gathering systems; liquified natural gas facilities; and underground natural gas storage facilities: Incident report.

(d) Supplemental report. Where additional related information is obtained after an operator submits a report under paragraph (a), (b), or (c) of this section, the operator must make a supplemental report as soon as practicable, with a clear reference by date to the original report.

Findings:

OPS 9 Gas Emergency Notification and Reporting (3.8.1) does not contain the verbiage as soon as practicable as required by 49 CFR §191.15.

Intermountain Gas Response

Intermountain Gas Company (IGC) acknowledges the findings brought forth by the IPUC as outlined above. OPS 9 - Gas Emergency Notification and Reporting, Section 3.8.1., has been updated to clarify that supplemental reports shall be submitted as soon as practicable.

2. 49 CFR §193.2707 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.

Findings:

IGC procedure 4552.2 Rexburg LNG Recognizing Abnormal Operating Conditions (Step 1.3-1.3.6) does not require Vaporization Technicians to monitor and observe both audible or visual alarm in Control Building during regular working hours that may indicate abnormal operating conditions, including vacuum alarms as required by 49 CFR §193.2707.

Intermountain Gas Response

Intermountain Gas Company (IGC) acknowledges the findings brought forth by the IPUC as outlined above. Procedure 4552 Rexburg LNG Recognizing Abnormal Operating Conditions includes the requirements for monitoring gas pressure and temperature as required by 49 CFR §193.2507 Monitoring Operations. While there is no warning alarm within the Control Center for vacuum pressure (i.e., zero to negative pressure), a low-pressure alarm would indicate an issue prior to the pressure reaching zero.

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3. **49 CFR §193.2515 Investigation of failures.**

(a) Each operator shall investigate the cause of each explosion, fire, or LNG spill or leak which results in:

(1) Death or injury requiring hospitalization; or

(2) Property damage exceeding \$10,000.

(b) As a result of the investigation, appropriate action must be taken to minimize recurrence of the incident.

(c) If the Administrator or relevant state agency under the pipeline safety laws (49 U.S.C. 60101 et seq.) investigates an incident, the operator involved shall make available all relevant information and provide reasonable assistance in conducting the investigation. Unless necessary to restore or maintain service, or for safety, no component involved in the incident may be moved from its location or otherwise altered until the investigation is complete or the investigating agency otherwise provides. Where components must be moved for operational or safety reasons, they must not be removed from the plant site and must be maintained intact to the extent practicable until the investigation is complete or the investigating agency otherwise provides.

Findings:

IGC procedure 4563 Rexburg LNG Material and/or Component Failure does not contain the verbiage as required by 49 CFR §193.2515 (c).

Intermountain Gas Response

Intermountain Gas Company (IGC) acknowledges the findings brought forth by the IPUC as outlined above. An MOC has been initiated to add additional language to procedure *4563 Rexburg LNG and/or Component Failure* to incorporate the requirements outlined in 49 CFR §193.2515(c). The revised procedure will implement on or before January 31, 2023.

4. **49 CFR §193.2617 Repairs.**

(a) Repair work on components must be performed and tested in a manner which:

(1) As far as practicable, complies with the applicable requirements of Subpart D of this part; and

(2) Assures the integrity and operational safety of the component being repaired.

(b) For repairs made while a component is operating, each operator shall include in the maintenance procedures under §193.2605 appropriate precautions to maintain the safety of personnel and property during repair activities.

Findings:

IGC procedure 4555 Rexburg LNG Equipment and Components (Step 2.12) does not contain verbiage as required by 49 CFR §193.2617 Repairs (a).

Intermountain Gas Response

Intermountain Gas Company (IGC) acknowledges the findings brought forth by the IPUC as outlined above. An MOC has been initiated to add additional language to procedure *4555 Rexburg LNG Equipment and Components* to incorporate the requirements outlined in 49 CFR §193.2617(a). The revised procedure will implement on or before January 31, 2023.

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

9.9 Other Operations.

9.9.2 Taking an LNG container out of service shall not be regarded as normal operation and shall not be attempted on any routine basis. All such activities shall require the preparation of detailed procedures.

Findings:

IGC procedure 4554 Section 1.1 does not contain the verbiage as required by NFPA 59A Section 9.9.2.

Intermountain Gas Response

Intermountain Gas Company (IGC) acknowledges the findings brought forth by the IPUC as outlined above. An MOC has been initiated to add additional language to procedure *4554 Rexburg LNG Isolating and Purging of Equipment* to incorporate the requirements outlined in NFPA 59A Section 9.9.2. The revised procedure will implement on or before January 31, 2023.

6. 49 CFR §193.2911 Security lighting.

Where security warning systems are not provided for security monitoring under §193.2913, the area around the facilities listed under §193.2905(a) and each protective enclosure must be illuminated with a minimum in service lighting intensity of not less than 2.2 lux (0.2 ftc) between sunset and sunrise.

Findings:

IGC procedure 4566 (Step 4.5.2) needs to have the verbiage as required by 49 CFR §193.2911.

Intermountain Gas Response

Intermountain Gas Company (IGC) acknowledges the findings brought forth by the IPUC as outlined above. An MOC has been initiated to add additional language to procedure *4566 Rexburg LNG Mobilization* to incorporate the requirements outlined in 49 CFR §193.2911. The revised procedure will implement on or before January 31, 2023.

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

Respectfully Submitted,



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