



Idaho Public Utilities Commission

P.O. Box 83720, Boise, ID 83720-0074

Brad Little, Governor

Eric Anderson, President
John R. Hammond, Jr., Commissioner
Edward Lodge, Commissioner

Apr 10, 2023

Report # I202302

Pat Darras – Vice President of Engineering & Operations Services
Intermountain Gas Company
400 N 4th St.
Bismarck, ND 58501

Dear Mr. Darras:

On Mar 27-30, 2023, the Idaho Public Utilities Commission (“Commission”), Pipeline Safety Division (“Staff”), conducted a Records inspection of Intermountain Gas Company (“IGC”) pursuant to Chapter 601 of Title 49, United States Code.

Staff observed that some of the Idaho natural gas distribution system owned and operated by IGC was out of compliance on item(s). This results in probable violations of the pipeline safety regulations Title 49, Code of Federal Regulations, Part 192. The probable violations are as follows:

PROBABLE VIOLATION(S)

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.
2. **49 CFR §192.475 Internal corrosion control: General**
 - (b) Whenever any pipe is removed from a pipeline for any reason, the internal surface must be inspected for evidence of corrosion.

IGC -Inspection, Evaluation, and Repair of Pipelines – OPS 327

- 3.9 Whenever the internal surface of steel pipe is exposed (damage, repair, replacement, etc.) the internal surface shall be inspected for evidence of internal corrosion.

Finding(s):

Project #583-0342 Report #600-9050 at 168 Bonny Dr. Twin Falls had 13' of steel pipe replaced. The Form 457 indicates that there was no internal inspection completed on the removed pipe section as required by 49 CFR §192.475 and IGC OPS Procedure 327.

3. 49 CFR §192.605 Procedural manual for operations, maintenance, and emergencies.

(b) *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.

4. 49 CFR §192.727 Abandonment or deactivation of facilities.

(b) Each pipeline abandoned in place must be disconnected from all sources and supplies of gas; purged of gas; in the case of offshore pipelines, filled with water or inert materials; and sealed at the ends. However, the pipeline need not be purged when the volume of gas is so small that there is no potential hazard.

IGC -Pipeline Purging and Cleaning – OPS 603

4.0 Purging out of service.

- 4.1. When purging large diameter mains, or long distances of pipelines when there is a significant probability of odor calls, contact local emergency services and Scheduling, a minimum of two (2) hours prior to commencing.
- 4.2. Purging out of service may be required when existing mains and services are taken out of service and the removal of residual natural gas is necessary.
- 4.3. Mains and services four inches (4") and smaller in diameter, do not require purging out of service provided they do not exceed the maximum allowable lengths shown in [Table 2](#) below.

Finding(s):

Project #421-0625 at E 41st St in Garden City and Project # 425-9831 at Eisenman and Gowen in Boise where pipelines were abandoned were not purged as required by 49 CFR §192.727 and IGC OPS Procedure 603.

REQUESTED ACTIONS

A reply to this correspondence is required no later than **45 days** from the date of this letter. Please submit a written reply providing a statement of all relevant facts including a complete description of the corrective action(s) taken with respect to the above referenced probable violations, and all actions to be taken to prevent future failures in these areas of concern. This written reply must be signed by an IGC official with authority to bind the company.

Please send all documents to our office at 11331 W. Chinden Blvd, Boise, Idaho 83714-1021. Be advised that all material you submit in response to this enforcement action may be a public record and subject to disclosure under Idaho's Public Records Law. *See Idaho Code §§74-101 et seq.*

If you wish to dispute any of the above referenced potential violations, you have the right to appear before the Pipeline Safety Division in an informal conference before May 25, 2023, at the above address. You have the right to present relevant documents and evidence 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 Orders 35095 and 35334*, which can be found at <https://puc.idaho.gov/>. If you intend to request an informal conference, please contact the Pipeline Safety Division no later than May 10, 2023.

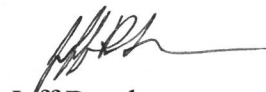
If you wish to dispute any of the allegations in this Notice, but do not want an informal conference, you may send the Pipeline Safety Division a written reply to this Notice. This written reply must be filed with the Commission on or before May 25, 2023, and must be signed by an IGC official with authority to bind the company. The reply must include a complete statement of all relevant facts, and all documentation, evidence, and argument IGC submits to refute any of the above referenced probable violations.

If you do not respond to this notice by May 25, 2023, you may be subject to any Commission enforcement action as allowed under Idaho law, including but not limited to, potential civil penalties of up to two hundred thousand (\$200,000). *See Idaho Code §61-712A.*

If you have any questions concerning this Notice, please contact me at (208) 334-0333. All written responses should be addressed to me at the above address, or you may fax your response to (208) 334-3762.

We appreciate your attention to this matter and your effort to promote pipeline safety.

Sincerely,



Jeff Brooks
Pipeline Safety, Program Manager
Idaho Public Utility Commission