

INTERMOUNTAIN GAS COMPANY

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

June 21, 2023

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

Subject: Response to Notice of Probable Violation dated May 25, 2023 (Report # I202303)

Dear Mr. Brooks,

This letter is intended to address one (1) probable violation stemming from a construction inspection conducted by the Idaho Public Utilities Commission (IPUC) on May 17, 2023, on service lines 317-24833 and 317-50850 of Intermountain Gas Company (IGC).

PROBABLE VIOLATIONS

I. 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.

IGC – Squeeze-Off of Plastic Pipe – OPS 309

2.2. Ground the squeeze-off tool with a static electric grounding device before placing the squeeze-off tool on the pipe, apply a soapy water solution and wet non synthetic cloth (such as cotton or burlap material) upstream of squeeze location, or commercially available electrostatic discharge fluid to the pipe surface on the squeeze location to provide for dissipation of static charge to the ground.

IGC – Equipment Calibration, Maintenance, and Testing – OPS 501

1.1. Company personnel and contractors are responsible for the calibration, maintenance, and testing of instruments used on company facilities, and to keep appropriate records of the date and type of calibration, maintenance, or testing performed.

6.1. Contractors completing work for MDUG shall calibrate/maintain their equipment per the frequencies and instructions provided in the MDUG Instrument Calibration Requirements List.

6.2. Equipment calibration expiration dates of instruments and equipment used on MDUG gas facilities shall be identified by a tag (e.g., sticker).

Finding(s):

During construction inspection on Service Line #317-24833 & 317-50850 at 11170 & 11182 Newton St. Caldwell, Idaho, a contractor representing IGC squeezed a service line without using soapy water solution and wet non synthetic cloth (such as cotton or burlap material) upstream of squeeze location, or commercially available electrostatic discharge fluid. Additionally, crew members were in the process of using expired calibration fusing equipment, Cradle (1/12/23), Plate Heater (3/31/23, and Facer (1/12/23), until IPUC inspector discovered expiration tags. Pictures available upon request of expired calibration tags.

EXECUTIVE OFFICES

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Intermountain Gas Response

IGC acknowledges the findings brought forth by the IPUC. The contractor, Das-Co of Idaho (Das-Co), suspended Operator Qualifications for the employee that did not utilize static suppression spray. The employee will not perform squeeze-off of plastic pipe until retraining has been completed in EWN.

Additionally, IGC management conducted a meeting with the Das-Co Vice President, Natural Gas Operations on June 15, 2023, regarding butt fusion equipment calibrations. Das-Co has made an enhancement to their internal process. Each Foreman has been provided a copy of McElroy inspection protocol and will be responsible for performing inspections and monitoring calibration stickers.

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

Respectfully Submitted,



Pat Darras

Vice President, Engineering & Operations Services
Intermountain Gas Company