

INTERMOUNTAIN GAS COMPANY

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

June 30, 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 # I202304)

Dear Mr. Brooks,

This letter is intended to address two (2) probable violations stemming from a field inspection conducted by the Idaho Public Utilities Commission (IPUC) on May 22-24, 2023, of Intermountain Gas Company (IGC).

PROBABLE VIOLATIONS

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.

OPS 500 Regulator Station Inspection and Maintenance

4.1. Regulators shall be set to lockup at the designated set pressure, unless setting during flow conditions allows the regulator to lockup at a pressure equal to or less than the MAOP. For example, a regulator may be set during flow conditions provided the set pressure plus the known droop (e.g., the difference between lockup and delivery pressure) does not exceed MAOP.

2. **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.*

Finding(s):

Regulator station 48363-RS-59887 and regulator station 48275-RS-59918 failed to lock up on the primary side. Metal shavings debris was found in each of the diaphragms and regulator bodies when disassembled. Fixed on-site with disassembly, debris removal, and retest.

Intermountain Gas Response

IGC acknowledges the findings brought forth by the IPUC. To prevent the collection of debris, IGC has ordered strainers that will be installed at regulator station 48363-RS-59887. The strainers will be installed by July 31, 2023.

While performing annual maintenance at regulator station 48275-RS-59918 on May 16, 2023, the primary and secondary regulators were working properly, including lock up. After inspection of the regulators, a needle valve was damaged, and the primary run was shut in to make repairs. While commissioning the primary run back into service following repair, debris was unknowingly pushed into the regulator as gas was reintroduced. The debris was removed, and the regulator was rebuilt and retested onsite during the field inspection. No further action needed.

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3. Appendix D to Part 192 – Criteria for Cathodic Protection and Determination of Measurements

i. Criteria for cathodic protection – A. Steel

1. A negative (cathodic) voltage of at least 0.85 volt, with reference to a saturated copper-copper sulfate half-cell. Determination of this voltage must be made with the protective current applied, and in accordance with section II and IV of this appendix.

Finding(s):

Regulator station 48267-RS-59849 did not meeting the criteria of having a negative (cathodic) voltage of at least 0.85 volts when measured with a saturated copper-copper sulfate half-cell. The CP Technician was able to fix the issue on site by remove an insulator of one of the flange bolts to bond the inlet high pressure side with the outlet and low pressure (regulated) side of the regulator station.

Intermountain Gas Response

IGC acknowledges the findings brought forth by the IPUC. The Corrosion Control Technician corrected the issue onsite by removing an insulator of one of the flange bolts to bond the inlet high pressure side with the outlet and low pressure (regulated) side of the regulator station. No further action needed.

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

Respectfully Submitted,



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