



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

May 25, 2023

Report # I202304

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

Dear Mr. Darras:

On May 22-24, 2023, the Idaho Public Utilities Commission (“Commission”), Pipeline Safety Division (“Staff”), conducted a Construction inspection on service lines 317-24833 & 317-50850 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. 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.

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 sections II and IV of this appendix.

Finding(s):

Regulator station 48267-RS-59849 did not meet 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 removing an insulator of one of the flange bolts to bond the inlet high pressure side with the outlet low pressure (regulated) side of the regulator station.

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 July 9, 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 June 24, 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 July 9, 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 July 9, 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,

A handwritten signature in black ink, appearing to read 'Jeff Brooks', with a long horizontal line extending to the right.

Jeff Brooks
Pipeline Safety, Program Manager
Idaho Public Utility Commission

