

EXECUTIVE OFFICES

INTERMOUNTAIN GAS COMPANY

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

August 24, 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 August 8, 2023 (Report # I202305)

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 August 2, 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.

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.

Finding(s):

During a construction inspection on Service Line # 011932-375 & 11014-375 at 86 and 102 N Coltsfoot Ave, Kuna, Idaho, a contractor representing IGC squeezed a service line without using 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.

This is the second finding of the same nature in less than 3 months – also reference NOPV # I202303.

Intermountain Gas Response

IGC acknowledges the findings brought forth by the IPUC. The contractor, Das-Co of Idaho (Das-Co), conducted a meeting on August 10, 2023, with all employees that perform work on IGC facilities (see Exhibit A). During the meeting *OPS 309 – Squeeze-Off of Plastic Pipe* was reviewed, and a hands-on demonstration of utilizing wet burlap for static suppression during squeeze off of plastic pipe was performed. Das-Co also ensured each crew was equipped with the appropriate tooling and material to properly execute squeeze off of plastic pipe.

Additionally, IGC has provided instruction for enhanced monitoring of adherence to *OPS 309* when Field Operations Coordinators (FOC) are on Contractor job sites.

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

Respectfully Submitted,

A handwritten signature in black ink that reads "Pat Darras". The signature is written in a cursive, flowing style.

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

Exhibit A

Squeezing Plastic Pipe



ORS 309

DATE: 8/10/23

TIME: 6:30 - 7:30

Name	Initials	Name	Initials	Name	Initials	Name	Initials
Hayden Anderson 100929	HA	Jaime Heredia Jr 100666	JH	Phillip Potgieter 100721	PP	Franco Massari	FM
Riockwell Bond 100990	RB	Juan Hernandez 100669	JH	Oscar Prado 100723		Steve Adams	SA
Tyler Booth 100924		Jack Jaeger-Bauder 100807	JB	Luis Puentes-Garcia 100786	LP	Larry Myers	LM
Ethan Call 100621	EC	Jalen Johnson 100947	JJ	Eric Ramirez 100997	ER	Jimmy Oakes	JO
Rigo Chavarin 100265	RC	Michael Krebs 100840	MK	Walker Ray 100730	WR	Juan Rodriguez	
Javier Conejo Jr. 100254	JC	Rey Lara 100985		Jaiden Reitz 100858		Cameron Beck	CB
Trey Dancer 100921	TD	Gerry Lowe 100920	GL	Marco Reyes 100993	MR	Austin Myers	
Shane Diaz 100971	SD	Jose Maceda 100257	off	Alexis Rodriguez 100986	AL	Angel Puga	AP
Christopher Dixon 100780	CD	Stevan Maceda 100808	SM	Librado Ruiz Sanchez 100740	LR	Andres Rodriguez	AR
Slayde Ellis 101000 FIRED		Valerie Martinez 100975	off	John Anthony Rusciollelli 100741	JR	Sergio Sanchez	SS
Ryan Enrico 100983	RE	Graysen May 100692	GM	Jose Saucedo 100995	JS	Justin Wilkinson	J.W.
Bryan Franco-Gomez 100893	BF	Noah Maxa 100973		Juan Soto 100262	J.S.		
Arturo Garcia Aguayo 100784	A.G.	Jose Mendóza 100989	JM	Donald Teel 100754	DT		
German Gomez 100654	GL	Hunter Mitchell 100992	BTS FLAG	Darcy Ugalde 100755	DU	WELDERS	
Dominic Greco 100658	DG	Jordan Oakes 100708	JO	Arthur (Bruno)Valenzuela 100248	AV	Sam Bierwirth 100266	SB
Nathan Gulley 100869	NG	Kyler Oakes 100779		Perdo Velazquez 100979	PV	Seth Lynn 100845	SL
Kodian Hale 100988	KH	Zackary Orr 100710	ZO	Kobi Voyson 100761	KV	Omar Madrigal 100912	
Jonathon Hammer 100661	JH	KC Osmus 100874	KO	Abel Arredondo	A.A.	Daniel Vance 100758	DV
Dylan Harbaugh 100824		JT Peterson 100977	JT	Joseph Carter	J.C.		

Rey Lara RL
 Jose Rodriguez 101011 JR
 Adam Nivens AN

Jesse Varela JV
 Joseph Browne JB
 Martin Reyes MR

Gilberto Soto G.S.
 Samuel Carillo SC

Handwritten scribbles and initials.