

EXECUTIVE OFFICES

INTERMOUNTAIN GAS COMPANY

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October 10, 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 September 6, 2023 (Report # I202306)

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 31, 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.

Working in Excavations-SF 418

1.4 Employees and contractors shall not begin excavation until the valid start date on the locate ticket, and/or all utility companies that are listed on the locate ticket have responded prior to beginning excavation.

Finding(s):

During a construction inspection on Service Line # 009710-367 at 12581 W Shortcreek St in Star, Idaho, a contractor representing IGC dug a trench for a service line installation using Locate Ticket # 311922 that expired on August 30, 2023.

Intermountain Gas Response

IGC acknowledges the findings brought forth by the IPUC. Das-Co is developing a quality protocol. The protocol will include a checklist that the foreman will be required to complete for every service installation. Included in the checklist will be the verification of a valid line locate. If the line locate is not valid, crews will be instructed not to proceed.

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

Respectfully Submitted,



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