

EXECUTIVE OFFICES

INTERMOUNTAIN GAS COMPANY

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

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 # I202307)

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 September 6, 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 505
1. GENERAL
1.1. Pressure tests shall be performed on MDU Utilities Group (MDUG) pipelines and facilities prior to being placed into service.
2. **49 CFR § 192.605 Procedural manual for operations, maintenance, and emergencies.**
(a) No person may operate a new segment of pipeline, or return to service a segment of pipeline that has been relocated or replaced until –
 - (1) It has been tested in accordance with this subpart and §192.619 to substantiate the maximum allowable operating pressure; and
 - (2) Each potentially hazardous leak has been located and eliminated.

Finding(s):

During a construction inspection on Service Line # 116734-425 at 11445 W Mesquite St in Boise, Idaho, a contractor representing IGC fused new plastic service piping to the existing, in service, squeezed off pipe stub without conducting a pressure test to the newly constructed service piping as required by CFR 192.503 and OPS 505.

Intermountain Gas Response

IGC acknowledges the findings brought forth by the IPUC. IGC Vice President, Field Operations and Director, Western Region met with Das-Co of Idaho (Das-Co) Executive Leadership on September 12, 2023. Das-Co is developing a quality protocol that will require the crew foreman to take pictures of critical steps during service installations, including pressure tests.

Based on inspection data provided by the Quality Management Systems department and third-party inspection, IGC is confident this is an isolated instance; however, IGC is in the process of performing leak survey on

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service installations that were completed by the foreman and crew in 2023. The fuser is no longer employed by Das-Co, and the foreman was immediately removed from performing work on IGC facilities. The foreman has since been retrained and requalified.

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 style with a large, prominent initial "P".

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