

EXECUTIVE OFFICES

INTERMOUNTAIN GAS COMPANY

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November 9, 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 28, 2023 (Report # I202308)

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 27, 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 # 04771-413 at 1988 S Cactus Lily Way in Meridian, ID, a contractor representing IGC dug a trench for a service line installation using Locate Ticket # 373562. That locate ticket is for 1948 S Cactus Lily Way, Meridian, ID. Per the 811-call center. The correct locate ticket for 1988 S Cactus Lily Way, Meridian, ID was 332847 and expired on 9/12/23.

Intermountain Gas Response

IGC acknowledges the findings brought forth by the IPUC. Effective December 1, 2023, contractor and company employees will be required to have a hard copy, or a readily available electronic copy, of the valid line locate ticket on the jobsite.

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

Respectfully Submitted,



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