

INTERMOUNTAIN GAS COMPANY

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November 15, 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 October 18, 2023 (Report # I202309)

Dear Mr. Brooks,

This letter is intended to address one (1) probable violation stemming from a construction inspection on project 667-0331 conducted by the Idaho Public Utilities Commission (IPUC) on October 17, 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.

IGC – Equipment Calibration, Maintenance, and Testing – OPS 501

- 1.1. Company personnel and contractors are responsible for the calibration, maintenance, and testing of instruments used on company facilities, and keep appropriate records of the date and type of calibration, maintenance, or testing performed.
6.1. Contractors completing work for MDUG shall calibrate/maintain per the frequencies and instructions provided in the MDUG Calibration Requirements List.
6.2. Equipment calibration expiration dates of instruments and equipment used on MDUG gas facilities shall be identified by a tag (e.g., sticker).

Finding(s):

During a construction inspection on project 667-0331 at 3151 Witnah Rd, American Falls, Idaho contractor crew members were using a touch pyrometer whose calibration had expired on 1/13/2023 until the IPUC inspector discovered the expiration tag. Pictures available upon request of calibration tag.

Intermountain Gas Response

IGC acknowledges the findings brought forth by the IPUC. To ensure the accuracy of the touch pyrometer with the expired calibration, the contractor, KV Inc. (KV), validated the expired touch pyrometer with a calibrated touch pyrometer while onsite. The validation concluded the expired touch pyrometer was working properly. The expired pyrometer has been removed from service until calibrated.

Additionally, KV took disciplinary action with the offending employee.

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

Respectfully Submitted,



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