

INTERMOUNTAIN GAS COMPANY

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

November 15, 2023

Mr. Jeff Brooks, Programs Manager
Idaho Public Utility Commission
PO Box 83720
Boise, ID 83720-0074

Subject: Response to Letter of Concern dated October 19, 2023 (Report # I202310)

Dear Mr. Brooks,

This letter is intended to address four (4) areas of concern stemming from a procedural, records, and field inspection conducted by the Idaho Public Utilities Commission (IPUC) on October 16, 2023, and October 18, 2023, of Intermountain Gas Company's (IGC) Rexburg LNG Plant.

PROBABLE VIOLATIONS

1. 49 CFR § 193.607 Foreign Material

(b) LNG plant grounds must be free from rubbish, debris, and other material which present a fire hazard. Grass areas on the LNG plant grounds must be maintained in a manner that does not present a fire hazard.

Finding(s):

Weeds within the facility need to be sprayed and pulled to prevent fire hazards.

Intermountain Gas Response

IGC acknowledges the findings brought forth by the IPUC. IGC utilizes a contractor for weed care that is on a seasonal schedule. The contractor typically performs weed care once a season, or more upon request. The contractor was behind on the 2023 fall schedule. The contractor sprayed and pulled weeds on October 25, 2023.

2. 49 CFR § 193.2609 Support Systems

Each support system or foundation of each component must be inspected for any detrimental change that could impair support.

Finding(s):

All tank saddles/supports are showing signs of cracking and measures to prevent further degradation need to be taken.

Intermountain Gas Response

IGC acknowledges the findings brought forth by the IPUC. IGC has contacted a third-party engineering company to discuss a repair and maintenance plan for tank saddles and supports.

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3. **49 CFR § 193.2613 Auxiliary power sources**

Each auxiliary power source must be tested monthly to check its operational capability and tested annually for capacity. The capacity test must take into account the power needed to start up and simultaneously operate equipment that would have to be served by that power source in an emergency.

Finding(s):

Procedure 4558 Rexburg LNG Fire Equipment Maintenance Step 2.5.4. The engine generator will be started and run once per month. The verbiage “and tested annually for capacity”, needs to be added as required.

Intermountain Gas Response

IGC acknowledges the findings brought forth by the IPUC. An MOC has been initiated to add additional language to procedure *4558 Rexburg LNG Fire Equipment Maintenance* to incorporate the requirements for annual capacity testing as outlined in 49 CFR § 193.2613.

4. **49 CFR § 193.2505 Cooldown**

(b) After cooldown stabilization is reached, cryogenic piping systems must be checked for leaks in areas of flanges, valves, and seals.

Finding(s):

This verbiage needs to be added to the Daily Plant checklist (b) After cooldown stabilization is reached, cryogenic piping systems must be checked for leaks in areas of flanges, valves, and seals.

Intermountain Gas Response

IGC acknowledges the findings brought forth by the IPUC. The Daily Plant checklist has been updated to incorporate the requirement for leak checks on cryogenic piping systems when cooldown stabilization is reached as outlined in 49 CFR § 193.2505.

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

Respectfully Submitted,



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