

EXECUTIVE OFFICES

INTERMOUNTAIN GAS COMPANY

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UTILITIES COMMISSION

July 29, 2020

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

Subject: Response to Notice of Probable Violation dated June 19, 2020 (Report # 1202003)

Dear Mr. Ulmer,

This letter is intended to address one probable violation stemming from a field inspection of Intermountain Gas Company's (IGC) equipment in the Nampa District conducted June 8-10, 2020.

PROBABLE VIOLATION

1. **49 CFR §192.739 (a) (4) Pressure limiting and regulating stations: Inspection and testing.**
Pressure limiting and regulating stations: Inspection and testing – reads: *Properly installed and protected from dirt, liquids, or other conditions that might prevent proper operation.* Which is also covered in IGC Procedure 4306 Sec. 4.1.1.

Finding:

During the inspection it was noted that regulator stations 30017, 30018, 30019, 30022, 30084, 30090, 30095, 30100, 30110 and 30195 had one or both regulators fail to lock up at the pre-established set point preventing proper operation.

Intermountain Gas Response

Intermountain Gas Company (IGC) acknowledges the findings brought forth by the IPUC stated above. As stated in previous responses, IGC created a *Failed to Lockup Mitigation Plan* that includes the following:

- Identification of regulator station regulators that failed a lockup test two or more times during calendar years 2016-2018.
- Review of the identified stations for an appropriate mitigation option: monitor, rebuild, pilot sulfur heater, pilot heater, stainless steel stems for pilots, line heater, or strainers.
- Creation of a ten-year schedule based on a consequence of failure rating.

Regulator station 30018 is scheduled to be replaced in 2020. Regulator station 30019 is scheduled to be retrofitted with strainers in 2022. The remaining eight regulator stations were not identified during the 2019 review. The following table was extracted from the annual inspection questions *Regulator 1 Operated Properly* and *Regulator 2 Operated Properly*. Based on the results, regulator stations 30017 and 30110 have been added to the *Failed to Lockup Mitigation Plan*; each being scheduled to have pilot sulfur filters installed in 2026.

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Station Number	2017 Reg 1	2017 Reg 2	2018 Reg 1	2018 Reg 2	2019 Reg 1	2019 Reg 2	2020 Reg 1	2020 Reg 2	Add to Plan
30017	Yes	Yes	No	Yes	No	Yes	Yes	Yes	Yes
30022	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No
30084	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No
30090	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	No
30095	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	No
30100	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No
30110	Yes	Yes	Yes	Yes	No	Yes	No	Yes	Yes
30195	NA	NA	NA	NA	Yes	Yes	Yes	Yes	No

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

Respectfully Submitted,



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