

INTERMOUNTAIN GAS COMPANY

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

RECEIVED

2020 OCT 14 AM 9:29

IDAHO PUBLIC
UTILITIES COMMISSION

October 9, 2020

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

Subject: Response to Notice of Probable Violations dated September 14, 2020 (Report # 1202008)

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 Idaho Falls District conducted August 31 – September 2, 2020. Specifically, we are addressing how we plan to bring the probable violation into full compliance.

PROBABLE VIOLATIONS**1. 49 CFR §192.739 (a) (1) Pressure limiting and regulating stations: Inspection and testing.**

Each pressure limiting station, relief device (except rupture discs), and pressure regulating station and its equipment must be subjected at intervals not exceeding 15 months, but at least once each calendar year, to inspections and tests to determine that it is -- (1) In good mechanical condition.

Finding:

During the inspection it was noted that regulator stations 70065, 70067, 70068, 70079, 70094, 70095, 70100, 70107 and 70110 were not plumbed for lock-up. Meter inspector was unable to demonstrate that the regulators were functioning properly and were able to lock-up when the necessity arrives.

Intermountain Gas Response

IGC acknowledges the findings brought forth by the IPUC stated above. As stated in previous responses, IGC created a *Not Plumbed for Lockup Mitigation Plan*. The plan identified regulator stations that are not equipped with pressure ports to perform flow and lockup and includes a ten-year mitigation schedule. The following table includes the mitigation plan and schedule for the nine regulator stations identified in the IPUC findings.

Regulator Station	Regulator Type - Mitigation Plan	Tentative Schedule
70065	Mooney 2x1 - Plumb to existing taps between isolation valves	2022
70067	Mooney 2x1 - Plumb to existing taps between isolation valves	2022
70068	Fisher 621 - Install gauge tap between isolation valves and plumb	2022
70079	Fisher 627 - Install gauge tap between isolation valves and plumb	2023
70094	Mooney 2x1 - Plumb to existing taps between isolation valves	2023
70095	Mooney 2x1 - Plumb to existing taps between isolation valves	2024
70100	Fisher 621 - Install gauge tap between isolation valves and plumb	2024
70107	Fisher 621 - Install gauge tap between isolation valves and plumb	2024
70110	Fisher 621 - Install gauge tap between isolation valves and plumb	2024

EXECUTIVE OFFICES

INTERMOUNTAIN GAS COMPANY

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

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

Respectfully Submitted,

A handwritten signature in cursive script that reads "Pat Darras".

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