



Idaho Public Utilities Commission

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Letter of Concern

March 23, 2020

Report # N202001

Nathan Caldwell
Northwest Gas Processing
Weiser Brown Operating
117 E. Calhoun St. (box 500)
Magnolia, AR 71753

Dear Mr. Caldwell:

On February 14 and 28, 2020, representatives of the Idaho Public Utilities Commission, Pipeline Safety, pursuant to Chapter 601 of Title 49, United States Code, conducted an onsite construction inspection of the Harmon Pipeline project #1 located in Payette, Idaho.

As a result of the inspection, it appears there are area(s) of concern that do not fully meet the intent of the pipeline safety regulations Title 49, Code of Federal Regulations, Part 192 for calendar year 2020.

The item(s) listed below are of concern:

1. § 192.605(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.*

During the inspection it was noted that Performance Energy, a welding crew employed by Northwest Gas Processing using Procedure PES-API-PQR-001 were not checking the preheat temperature at the weld groove and weld area as required by Northwest Gas Processing Operations and Maintenance Manual procedure 16.8 Preheat and Post Heat.

The above mentioned items were brought to the attention of your representatives during the onsite inspections. We would request that you review these matters and respond in writing within 30 days regarding the above issue including any planned corrective actions.

If you have any questions concerning this notice, please contact me at (208) 334-0321. All written responses should be addressed to me at: 11311 W Chinden Blvd, Ste 201-A, Boise, Idaho 83714 or you can fax your response to (208) 334-3762.

Because of the good faith that you have exhibited up to this time, we expect that you will take action to bring your program into compliance with pipeline safety regulations.

We appreciate your attention to this matter and your effort to promote pipeline safety.

Sincerely,



Darrin M. Ulmer

Pipeline Safety, Program Manager
Idaho Public Utility Commission