

October 15, 2021

Sean Mayo – Pipeline Safety Director
Washington Utilities and Transportation Commission
PO Box 47250
Olympia, WA 98504-7250

Subject: CNGC response to Probable Violation RE: 2021 Natural Gas Standard Inspection – Cascade Natural Gas Company – Moses Lake (Insp. No. 8256)

Dear Mr. Mayo,

This letter is intended to address one probable violation stemming from a Standard Natural Gas inspection of Cascade Natural Gas Corporation's (CNGC) Moses Lake District performed by the Washington Utilities and Transportation Commission (WUTC) from August 25, 2021 to August 26, 2021 (Insp. No. 8256).

PROBABLE VIOLATION

1. **49 CFR §192.481(b) Atmospheric corrosion control: Monitoring.**

(b) During inspections the operator must give particular attention to pipe at soil-to-air interfaces, under thermal insulation, under disbanded coatings, at pipe supports, in splash zones, at deck penetrations, and in spans over water.

Finding(s):

During field inspections in the Moses Lake District, UTC Staff observed indications of active corrosion at the north end of the N. Stratford bridge crossing over Hwy 17 in Moses Lake. Approximately 2-feet of the pipeline coating was deteriorated or missing where the pipeline exited the concrete bridge abutment. The pipeline was in contact with the concrete and showed signs of potential corrosion. Distribution patrol records did not document any deficiencies of the pipeline and the condition of the pipeline was marked as "good". Atmospheric corrosion inspections are required as part of CNGC's patrol procedures (OPS 610).



Cascade Response

CNGC acknowledges the findings brought forth by the WUTC. Following additional Field Operations inspection and Engineering Services review, it was determined that while the area of atmospheric corrosion outlined above does not indicate wall loss, the pipeline span should be replaced. As such, CNGC intends to use the existing pipeline as a casing for a 2-inch replacement segment spanning the length of the bridge crossing (approximately 180 feet). The replacement project schedule will be established based on permitting requirements. Additionally, CNGC conducted supplemental training on *OPS 610 – Pipeline Patrolling and Continuing Surveillance* with affected personnel (see Attachment A).

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

Respectfully Submitted,



Pat Darras
Vice President, Engineering & Operations Services
Cascade Natural Gas Corporation

ATTACHMENT A

Company: Cascade Natural Gas Corporation

20231(10-94)
(Rev. 2/10)

THIS IS AN IMPORTANT COMPANY RECORD.
— DO NOT DESTROY —

TRAINING ATTENDANCE SHEET

DATE: 9.14.21

TIME: 8:00




LOCATION: Moses Lake

INSTRUCTOR: Sam Grant

SUBJECT: OPS-610 Retrained employees on proper documentation and always looking at entire crossings including Both ends on bridge crossing.

WRITTEN MATERIALS:

ATTENDEES

	SIGNATURE	NAME (Type or print)	EMPLOYEE NO.	WORK LOCATION
1.		<u>Cole Brunel</u>	<u>835972</u>	<u>Moses Lake</u>
2.		<u>Jason Edson</u>	<u>509649</u>	<u>M.L.</u>
3.		<u>Wes Hoffstot</u>	<u>943904</u>	<u>M.L.</u>
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