



STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

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Sent via email

September 16, 2021

Pat Darras
VP, Engineering & Ops Services
Cascade Natural Gas Corporation
400 North 4th Street
Bismarck, ND 58501

RE: 2021 Natural Gas Standard Inspection – Moses Lake district – (Insp. No. 8256)

Dear Mr. Darras:

Staff from the Washington Utilities and Transportation Commission (staff) conducted a Standard Natural Gas inspection of Cascade Natural Gas Co's Moses Lake Inspection Unit from August 25, 2021 to August 26, 2021. This inspection included a records review and inspection of the pipeline facilities.

Our inspection indicates one probable violation as noted in the enclosed report.

Your response needed

Please review the attached report and respond in writing by October 18, 2021. The response should include how and when you plan to bring the probable violations into full compliance.

What happens after you respond to this letter?

The attached report presents staff's decision on probable violations and does not constitute a finding of violation by the commission at this time.

After you respond in writing to this letter, there are several possible actions the commission, in its discretion, may take with respect to this matter. For example, the commission may:

- Issue an administrative penalty under [RCW 81.04.405](#); or
- Issue a complaint under [RCW 81.88.040](#), seeking monetary penalties, changes in the company's practices, or other relief authorized by law, and justified by the circumstances. Any pipeline company that violates any pipeline safety provision of any commission order, or any rule in this chapter including those rules adopted by reference, or chapter [81.88](#) RCW is subject to a civil penalty not to exceed \$218,647 for each violation for

each day that the violation persists. The maximum civil penalty for a related series of violations is \$2,186,465; or

- Consider the matter resolved without further commission action.

We have not yet decided whether to pursue a penalty or complaint in this matter. Should the commission decide to assess a penalty or initiate a complaint, your company will have an opportunity to respond and formally present its position.

If you have any questions or if we may be of any assistance, please contact Scott Rukke at (360) 870-4923. Please refer to the subject matter described above in any future correspondence pertaining to this inspection.

Sincerely,

Sean C. Mayo
Pipeline Safety Director

Enclosure

cc: Josh Sanders, Dir, Ops Policy & Procedures, CNGC
Mike Schoepp, Dir, Operations Services, CNGC
Ryan Privratsky, Dir, System Integrity, Integrity Management, CNGC

UTILITIES AND TRANSPORTATION COMMISSION
2021 Natural Gas Pipeline Safety Inspection
Cascade Natural Gas Co's, Moses Lake Inspection Unit

The following probable violation of Title 49 CFR Part 192 was noted as a result of the 2021 inspection of the Cascade Natural Gas Co's Moses Lake Inspection Unit. The inspection included a random selection of records, operation and maintenance (O&M), emergency response, inventory, and field inspection of the pipeline facilities.

PROBABLE VIOLATIONS

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).

