

# Inspection Output (IOR)

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## Report Filters

Assets All, and including items not linked to any asset.

Results Unsat,Concern

## Inspection Information

Inspection Name	8424-CNGC Shelton Unit Standard	Operator(s)	CASCADE NATURAL GAS CORP (2128)	Plan Submitted	03/31/2022
		Lead	Dennis Ritter	Plan Approval	03/31/2022 by Scott Rukke
Status	PLANNED	Team Members	Derek Norwood	All Activity Start	06/13/2022
Start Year	2022	Observer(s)	David Cullom, Lex Vinsel, Anthony Dorrough, Deborah Becker, Scott Anderson, Darren Tinnerstet	All Activity End	06/30/2022
System Type	GD	Supervisor	Scott Rukke	Inspection Submitted	--
Protocol Set ID	WA.GD.2021.02	Director	Sean Mayo	Inspection Approval	--

## Inspection Summary

### Inspection Scope and Summary

2022 Shelton unit inspection of CNGC. The unit is located in Mason County, WA and spans from Shelton up to Belfair. Major towns in this unit include Shelton, Allyn and Belfair. This unit has 64.73 miles of distribution main (60 psig MAOP or less) and 38.36 miles of main over 60 psig. There are also 2712 services lines (distinct work order IDs) in this district. This inspection reviewed code required records for reporting, maintenance and operations, cathodic protection, MAOP and field inspection of operator assets. Field assets visited are noted in Form R in the 8424 inspection database. They are also noted in the Attachments to the IA inspection and include, CP test points, rectifiers, casings, regulator stations, bridge patrols, valves and right-of-way patrols.

### Facilities visited and Total AFOD

The records were mostly reviewed remotely using MS Teams and utilizing a secure SharePoint site. Additional records not amenable to remote review, leak surveys and construction records, were reviewed on site in Elma, WA on June 28, 2022. Operator assets and locations visited are recorded on Form R in the Attachments.

Total AFODs: records and field--8 days

Exit Interview conducted on site in Shelton June 30, 2022. Colby Lundstrom CNGC, Wendy McDonough CNGC, Dennis Ritter, WUTC.

### Summary of Significant Findings

*(DO NOT Discuss Enforcement options)*

No significant findings were noted from the inspection. There was one leak re-evaluation that did not occur in 2019 at 112 W Franklin, Shelton, however, that leak has been rectified as the pipe was removed from service in 2022.

### Primary Operator contacts and/or participants

Colby Lundstrom, Manager, Compliance and Operations Programs

Wendy McDonough, Compliance Audit Specialist

### Operator executive contact and mailing address for any official correspondence

Pat Darras, VP Engineering and Ops Services

400 North 4th Street, Bismarck, North Dakota 58501

701-222-7611

## Scope (Assets)

#	Short Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1.	90885 (1962)	Cascade Natural Gas-SHELTON	unit	90885	Storage Fields Bottle/Pipe - Holders Vault Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric	144	144	89		61.8%

1. Percent completion excludes unanswered questions planned as "always observe".

## Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	90885 (1962)	WUTC Standard Inspection	PRO, PRR, FR, GDIM, MMLPGIM, MISCTOPICS, GENERIC	P, R, O, S	Detail	--

## Plan Implementations

Activity #	Name	SMART Act#	Start Date	End Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Inspected	Total	Required % Complete
1.	Records	--	06/13/2022	06/16/2022	--	all planned questions	all assets	P, R	88	88	88		100.0%
2.	Field	--	06/27/2022	06/30/2022	--	all planned questions	all assets	O	56	56	1		1.8%

1. Since questions may be implemented in multiple activities, but answered only once, questions may be represented more than once in this table.

2. Percent completion excludes unanswered questions planned as "always observe".

## Forms

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1.	Attendance List	Records	COMPLETED	07/19/2022	Records	90885 (1962)
2.	Attendance List	Field	COMPLETED	07/19/2022	Field	90885 (1962)

## Results (Unsat, Concern values, 2 results)

### PRR.OM: Operations And Maintenance

1. Question Result, ID, References **Concern, MO.RW.LEAKREPAIRTIME.R,**

Question Text *Do records indicate that leaks were repaired and re-evaluated in the timeframes specified in WAC 480-93-18601?*

Assets Covered **90885 (1962)**

Result Issue Summary Leak re-evaluation was missed in 2019, and completed in 2020 and 2021. Line was taken out of service in 2022.

Result Notes 4 records total for the district since last inspection:

WO 272762 7/18/17, 112 W Franklin, Shelton Grade 3, Kevin Berner, map with CGI reads OK--annual not to exceed 15 month follow up: 8/18/18, 12/2/20, 6/8/21, 3/9/22, repaired 3/5/22, follow up 3/10/22 **NOTE missed 2019**

WO 269633 6/10/19 631 Dayton Rd Shelton, Grade 1, Kevin Berner, 1/2" PE service line was hit by backhoe; repaired cut and capped, 6/10/19. No residual as line was hit with backhoe. Map with CGI reads OK.

WO 273158 9/19/19, 520 W Laurel St. Shelton, Grade 1, Kevin Berner, 5/8" PE service hit by grader, line was repaired 9/18/19. No residual, map with CGI reads OK

WO 5892371883 11/18/21, 422 1st St Shelton, Grade 3, Charles Jenkins, 2" stl main corrosion leak, line was repaired with band clamp 11/2/21, line retired 12/30/21.

## FR.FIELDPIPE: Pipeline Inspection (Field)

2. Question Result, ID, Concern, DC.METERREGSVC.CUSTOMETERREGLOC.O, 192.351 (192.353(a), 192.353(b), 192.353(c), References 192.353(d))

Question Text *Are meters and service regulators being located consistent with the requirements of 192.353?*

Assets Covered 90885 (1962)

Result Issue Summary Vent opening near regulator vent was noted in two instances: 811 St Andrews Rd Shelton, and 1700 Fairmont Shelton. Operator was made aware. Not a retroactive code requirement.

Result Notes Vent opening near regulator vent was noted in two instances: 811 St Andrews Rd Shelton, and 1700 Fairmont Shelton. Operator was made aware. Not a retroactive code requirement.

Except as required to be disclosed by law, any inspection documentation, including completed protocol forms, summary reports, executive summary reports, and enforcement documentation are for internal use only by federal or state pipeline safety regulators. Some inspection documentation may contain information which the operator considers to be confidential. In addition, supplemental inspection guidance and related documents in the file library are also for internal use only by federal or state pipeline safety regulators (with the exception of documents published in the federal register, such as advisory bulletins). Do not distribute or otherwise disclose such material outside of the state or federal pipeline regulatory organizations. Requests for such information from other government organizations (including, but not limited to, NTSB, GAO, IG, or Congressional Staff) should be referred to PHMSA Headquarters Management.

# Inspection Results (IRR)

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- 90885 (1962) (95)

## Inspection Results Report (ALL Non-Empty Results) - Scp\_PK 90885 (1962)

Row	Assets	Result	(Note <sup>1</sup> )	Sub-Group	Qs t #	Question ID	References	Question Text
1.	90885 (1962)	Sat		PRO.SUBLNORMOPS	7.	MO.GO.ODDOR.P	192.605(a) (192.605(b)(11))	Does the process require prompt response to the report of a gas odor inside or near a building?
2.	90885 (1962)	NA		PRR.REPORT	1.	RPT.RR.IMMEDREPORT.R	191.5(a) (191.7(a), 191.7(d))	Do records indicate immediate notifications of incidents were made in accordance with 191.5?
3.	90885 (1962)	NA		PRR.REPORT	2.	RPT.RR.INCIDENTREPORT.R	191.9(a)	Do records indicate reportable incidents were identified and reports were submitted to DOT on Form 7100.1 within the required time frame?
4.	90885 (1962)	NA		PRR.REPORT	3.	RPT.RR.INCIDENTREPORTSUPP.R	191.9(b)	Do records indicate accurate supplemental incident reports were filed and within the required timeframe?
5.	90885 (1962)	Sat		PRR.REPORT	4.	RPT.RR.ANNUALREPORT.R	191.11(a)	Have complete and accurate Annual Reports been submitted?
6.	90885 (1962)	Sat		PRR.REPORT	5.	RPT.RR.UTCANNUALREPORTS.R		Have complete and accurate annual reports been submitted to the commission?

## Inspection Results Report (ALL Non-Empty Results) - Scp\_PK 90885 (1962)

Row	Assets	Result	(Note <sup>1</sup> )	Sub-Group	Qst #	Question ID	References	Question Text
7.	90885 (1962)	Sat		PRR.REPORT	6.	RPT.RR.MISDATAREPORTS.R		Has the operator submitted a copy of DOT Drug and Alcohol Testing MIS Data Collection Form to the commission when required?
8.	90885 (1962)	Sat	2	PRR.REPORT	7.	GDIM.RR.MECHANICALFITTINGDATAIMPL.R	192.1009 (191.12)	Have accurate records been maintained documenting mechanical fitting failures that resulted in hazardous leaks?
9.	90885 (1962)	NA		PRR.REPORT	8.	RPT.RR.SRCR.R	191.23(a) (191.23(b)), 191.25(a), 191.25(c)	Do records indicate safety-related condition reports were filed as required?
10.	90885 (1962)	NA		PRR.REPORT	9.	RPT.RR.MAOPINCREASENOTIFY.R		Do records indicate submittal of a written plan of procedures to the commission at least forty-five days before uprating to a MAOP greater than 60 psig?
11.	90885 (1962)	NA		PRR.REPORT	10.	RPT.RR.THIRTYDAYRPT.R		Has the operator submitted a written report within 30 days following each reportable incident?
12.	90885 (1962)	Sat		PRR.REPORT	11.	MO.GO.CUSTNOTIFY.R	192.16(d) (192.16(a)), 192.16(b), 192.16(c)	Do records indicate the customer notification process satisfies the requirements of 192.16?

## Inspection Results Report (ALL Non-Empty Results) - Scp\_PK 90885 (1962)

Row	Assets	Result	(Note <sup>1</sup> )	Sub-Group	Qs t #	Question ID	References	Question Text
13.	90885 (1962)	Sat		PRR.REPORT	12.	RPT.RR.DAILYCONSTRUCTIONRPT.R		Do records indicate daily construction and repair activities were emailed to the commission no later than 10 AM each day work is scheduled?
14.	90885 (1962)	NA		PRR.REPORT	13.	RPT.RR.PIPELINEMAPPING.R		Has the operator provided accurate maps (or updates) of all pipelines operating over 250 psig to specifications developed by the commission sufficient to meet the needs of first responders?
15.	90885 (1962)	Sat		PRR.CORROSION	1.	TQ.QU.CORROSION.R	192.453 (192.807(a), 192.807(b))	Do records indicate qualification of personnel implementing pipeline corrosion control methods?
16.	90885 (1962)	Sat		PRR.CORROSION	2.	TD.CP.RECORDS.R	192.491(a)	Do records indicate the location of all items listed in 192.491(a)?
17.	90885 (1962)	Sat		PRR.CORROSION	3.	TD.CPMONITOR.CURRENTTEST.R	192.491(c) (192.465(b))	Do records document details of electrical checks of sources of rectifiers or other impressed current sources?
18.	90885 (1962)	Sat		PRR.CORROSION	4.	TD.CPEXPOSED.EXPOSEINSPECT.R	192.491(c) (192.459)	Do records adequately document that exposed buried piping was examined for corrosion?

## Inspection Results Report (ALL Non-Empty Results) - Scp\_PK 90885 (1962)

Row	Assets	Result	(Note <sup>1</sup> )	Sub-Group	Question #	Question ID	References	Question Text
19.	90885 (1962)	Sat		PRR.CORROSION	5.	TD.CPMONITOR.TEST.R	192.491(c) (192.465(a))	Do records adequately document cathodic protection monitoring tests have occurred as required?
20.	90885 (1962)	NA		PRR.CORROSION	6.	TD.CPMONITOR.REVCURRENTTEST.R	192.491(c) (192.465(c))	Do records document details of electrical checks interference bonds, diodes, and reverse current switches?
21.	90885 (1962)	NA		PRR.CORROSION	7.	TD.CPMONITOR.DEFICIENCY.R	192.491(c) (192.465(d))	Do records adequately document actions taken to correct any identified deficiencies in corrosion control?
22.	90885 (1962)	Sat		PRR.CORROSION	8.	TD.CP.UNPROTECT.R	192.491(c) (192.465(e))	Do records adequately document that exposed buried piping was examined for corrosion and deteriorated coating?
23.	90885 (1962)	NA		PRR.CORROSION	9.	FS.FG.CASINGTESTLEAD.R		Do records indicate that all casings without vents installed after September 5, 1992 had separate test lead wires installed?
24.	90885 (1962)	Sat		PRR.CORROSION	10.	FS.FG.CASINGSEALS.R		Do records indicate that mains and service lines installed in casing or conduit are sealed at the ends as required?
25.	90885 (1962)	Sat		PRR.CORROSION	11.	TD.CP.ELECISOLATE.R	192.491(c) (192.467(a), 192.467(b), 192.467(c),	Do records adequately document electrical isolation of

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Row	Assets	Result	(Note <sup>1</sup> )	Sub-Group	Question #	Question ID	References	Question Text
							192.467(d), 192.467(e))	each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?
26.	90885 (1962)	Sat		PRR.CORROSION	12.	TD.CP.CASINGINSPECT.R		Do records indicate that annual casing inspections have been performed to ensure electrical isolation from the pipeline?
27.	90885 (1962)	Sat		PRR.CORROSION	13.	TD.CP.MONITOR.TESTSTATION.R	192.469	Do records identify the location of test stations and show a sufficient number of test stations?
28.	90885 (1962)	Sat		PRR.CORROSION	14.	TD.CP.MONITOR.TESTLEAD.R	192.491(c) (192.471(a), 192.471(b), 192.471(c))	Do records document that pipelines with cathodic protection have electrical test leads installed in accordance with requirements of Subpart I?
29.	90885 (1962)	NA		PRR.CORROSION	15.	TD.CP.MONITOR.INTFRCURRENT.R	192.491(c) (192.473(a))	Do records document an effective program is in place to minimize detrimental effects of interference currents and that detrimental effects of interference currents from CP systems



## Inspection Results Report (ALL Non-Empty Results) - Scp\_PK 90885 (1962)

Row	Assets	Result	(Note <sup>1</sup> )	Sub-Group	Question #	Question ID	References	Question Text
								on other underground metallic structures are minimized?
30.	90885 (1962)	NA		PRR.CORROSION	16.	TD.ICP.CORRGAS.R	192.491(c) (192.475(a))	Do the records demonstrate that the corrosive effect of the gas in the pipeline has been investigated and if determined to be corrosive, steps be taken to minimize internal corrosion?
31.	90885 (1962)	Sat		PRR.CORROSION	17.	TD.ICP.EXAMINE.R	192.491(c) (192.475(a), 192.475(b))	Do records document examination of removed pipe for evidence of internal corrosion?
32.	90885 (1962)	NA		PRR.CORROSION	18.	TD.ICP.CORRGASACTION.R	192.491(c) (192.477)	Do records document the actions taken when corrosive gas is being transported by pipeline?
33.	90885 (1962)	Sat		PRR.CORROSION	19.	TD.ATM.ATMCORRODEINSP.R	192.491(c) (192.481(a), 192.481(b), 192.481(c))	Do records document inspection of aboveground pipe for atmospheric corrosion?
34.	90885 (1962)	Sat		PRR.CORROSION	20.	TD.COAT.NEWPIPE.R	192.491(c) (192.455(a), 192.461(a), 192.461(b), 192.483(a))	Do records document that each buried or submerged pipeline installed after July 31, 1971 has been externally coated with a suitable coating material?
35.	90885 (1962)	Sat		PRR.CORROSION	21.	TD.ICP.EVALUATE.R	192.491(c) (192.487)	Do records document

## Inspection Results Report (ALL Non-Empty Results) - Scp\_PK 90885 (1962)

Row	Assets	Result	(Note <sup>1</sup> )	Sub-Group	Qs t #	Question ID	References	Question Text
								adequate evaluation of internally corroded pipe?
36.	90885 (1962)	NA		PRR.CORROSION	22.	AR.RCOM.REPAIR.R	192.487 (192.489)	Do records document the repair or replacement of pipe that has been internally corroded to an extent that there is not sufficient remaining strength in the pipe wall?
37.	90885 (1962)	Sat		PRR.PT	1.	DC.PTLOWPRESS.PRESSTESTLOWSTRESS.R	192.517(a) (192.507(a), 192.507(b), 192.507(c))	Do records indicate that pressure testing is conducted in accordance with 192.507?
38.	90885 (1962)	Sat		PRR.PT	2.	DC.PTLOWPRESS.PRESSTEST100PSIG.R	192.517(b) (192.509(a), 192.509(b))	Do records indicate that pressure testing is conducted in accordance with 192.509(a) (except for service lines and plastic pipelines)?
39.	90885 (1962)	Sat		PRR.PT	3.	DC.PT.SERVICELINE.R	192.517(b) (192.511(a), 192.511(b), 192.511(c))	Do records indicate that pressure testing is conducted in accordance with 192.511?
40.	90885 (1962)	Sat		PRR.PT	4.	DC.PT.PRESSTESTPLASTIC.R	192.517(b) (192.513(a), 192.513(b), 192.513(c), 192.513(d))	Do records indicate that pressure testing is conducted in accordance with 192.513?
41.	90885 (1962)	NA		PRR.UPRATE	1.	MO.GOUPRATE.MAOPINCREASE.R	192.553(a) (192.553(b), 192.553(c))	Do records indicate that increases in MAOP of pipeline were determined in accordance

## Inspection Results Report (ALL Non-Empty Results) - Scp\_PK 90885 (1962)

Row	Assets	Result	(Note <sup>1</sup> )	Sub-Group	Question #	Question ID	References	Question Text
								with 192.553?
42.	90885 (1962)	NA		PRR.UPRATE	2.	MO.GOUPRATE.MAOPINCREASELIMIT.R	192.553(b) (192.553(c), 192.553(d), 192.557(a))	Do records indicate that increases in MAOP are limited in accordance with 192.619 and 192.621?
43.	90885 (1962)	NA		PRR.UPRATE	3.	MO.GOUPRATE.MAOPINCREASEPREP.R	192.553(b) (192.553(c), 192.553(a), 192.557(b), 192.557(c))	Do records indicate that increases in MAOP were preceded by the actions specified in 192.557?
44.	90885 (1962)	Sat		PRR.OM	1.	MO.GO.OMANNUALREVIEW.R	192.605(a)	Have annual reviews of the written procedures or processes in the manual been conducted as required?
45.	90885 (1962)	Sat		PRR.OM	2.	MO.GO.OMHISTORY.R	192.605(a) (192.605(b)(3))	Are construction records, maps and operating history available to appropriate operating personnel?
46.	90885 (1962)	Sat		PRR.OM	3.	MO.GO.OMEFFECTREVIEW.R	192.605(a) (192.605(b)(8))	Do records indicate periodic review of the work done by operator personnel to determine the effectiveness, and adequacy of the processes used in normal operations and maintenance and modifying the processes when deficiencies are found?

## Inspection Results Report (ALL Non-Empty Results) - Scp\_PK 90885 (1962)

Row	Assets	Result	(Note <sup>1</sup> )	Sub-Group	Question #	Question ID	References	Question Text
47.	90885 (1962)	NA		PRR.OM	5.	MO.GOCLASS.CLASSLOCATESTUDY.R	192.605(b)(1) (192.609(a), 192.609(b), 192.609(c), 192.609(d), 192.609(e), 192.609(f))	Do records indicate performance of the required study whenever the population along a pipeline increased or there was an indication that the pipe hoop stress was not commensurate with the present class location?
48.	90885 (1962)	NA		PRR.OM	6.	EP.ERG.POSTEVTREVIEW.R	192.605(a) (192.615(b)(1) , 192.615(b)(3))	Do records indicate review of employee activities to determine whether the procedures were effectively followed in each emergency?
49.	90885 (1962)	Sat		PRR.OM	7.	EP.ERG.TRAINING.R	192.605(a) (192.615(b)(2) )	Has the operator trained the appropriate operating personnel on emergency procedures and verified that the training was effective in accordance with its procedures?
50.	90885 (1962)	Sat	2	PRR.OM	8.	EP.ERG.LIAISON.R	192.605(a) (192.615(c)(1) , 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), ADB-05-03)	Do records indicate liaisons established and maintained with appropriate fire, police and other public officials and utility owners in accordance with procedures?

## Inspection Results Report (ALL Non-Empty Results) - Scp\_PK 90885 (1962)

Row	Assets	Result	(Note <sup>1</sup> )	Sub-Group	Qs t #	Question ID	References	Question Text
51.	90885 (1962)	Sat	2	PRR.OM	9.	PD.PA.LANGUAGE.R	192.616(g) (API RP 1162 Section 2.3.1)	Were materials and messages developed and delivered in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?
52.	90885 (1962)	Sat	2	PRR.OM	10.	PD.PA.EVALEFFECTIVENESS.R	192.616(c) (API RP 1162 Section 8.4)	Have effectiveness evaluation(s) of the program been performed for all stakeholder groups in all notification areas along all systems covered by the program?
53.	90885 (1962)	NA	2	PRR.OM	11.	PD.PA.MSTRMETER.R	192.616(j) (192.616(h), API RP 1162 Section 2.7 (Step 12), API RP 1162 Section 8.5)	Do records indicate the public awareness program for a master meter or petroleum gas system operator has met the requirements of Part 192?
54.	90885 (1962)	NA		PRR.OM	12.	EP.ERG.INCIDENTANALYSIS.R	192.605(a) (192.617)	Do records indicate actions initiated to analyze accidents and failures, including the collection of appropriate samples for laboratory examination to determine the causes of the failure and minimize

## Inspection Results Report (ALL Non-Empty Results) - Scp\_PK 90885 (1962)

Row	Assets	Result	(Note <sup>1</sup> )	Sub-Group	Qs t #	Question ID	References	Question Text
								the possibility of recurrence, in accordance with its procedures?
55.	90885 (1962)	Sat		PRR.OM	13.	PD.DP.PDPROGRAM.R	192.614(c)	Does the damage prevention program meet minimum requirements specified in 192.614(c)?
56.	90885 (1962)	Sat		PRR.OM	14.	MO.GOMAOP.MAOPDETERMINE.R	192.619(a) (192.619(b), 192.621(a), 192.621(b), 192.623(a), 192.623(b))	Do records indicate determination of the MAOP of pipeline segments in accordance with 192.619 and limiting of the operating pressure as required?
57.	90885 (1962)	Sat		PRR.OM	15.	MO.GOODOR.ODORIZE.R	192.709(c) (192.625(a), 192.625(b), 192.625(c), 192.625(d), 192.625(e), 192.625(f))	Do records indicate appropriate odorization of its combustible gases in accordance with its processes and conduct of the required testing to verify odorant levels met requirements?
58.	90885 (1962)	Sat		PRR.OM	18.	MO.RW.DISTPATROL.R	192.603(b) (192.721(a), 192.721(b))	Do records indicate distribution patrolling was conducted as required?
59.	90885 (1962)	Sat		PRR.OM	19.	MO.RW.LEAKFOLLOW.R		Do records indicate that a follow-up inspection was performed not more than thirty days following a

## Inspection Results Report (ALL Non-Empty Results) - Scp\_PK 90885 (1962)

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								repair where residual gas remained in the ground?
60.	90885 (1962)	NA		PRR.OM	20.	MO.RW.DOWNGRADELEAKREPAIR.R		Do records indicate that leaks that have been downgraded are repaired within twenty-one months?
61.	90885 (1962)	Concern		PRR.OM	21.	MO.RW.LEAKREPAIRTIME.R		Do records indicate that leaks were repaired and re-evaluated in the timeframes specified in WAC 480-93-18601?
62.	90885 (1962)	Sat		PRR.OM	22.	MO.RW.LEAKRECORDS.R		Have gas leak records been prepared and maintained as required?
63.	90885 (1962)	Sat		PRR.OM	23.	MO.RW.DISTPATROLLEAKAGE.R	192.603(b) (192.723(a), 192.723(b))	Do records indicate distribution leakage surveys were conducted as required?
64.	90885 (1962)	NA		PRR.OM	24.	MO.RW.CASINGLEAKSURVEY.R		Do records indicate shorted casings were leak surveyed as required?
65.	90885 (1962)	Sat		PRR.OM	25.	MO.RW.MARKERSURVEY.R		Do records indicate that pipeline marker surveys were completed in the timeframe specified by WAC 480-93-124?
66.	90885 (1962)	Sat		PRR.OM	26.	MO.RW.MARKERREPLACE.R		Do records indicate that damaged or missing markers were replaced within forty-five days of discovery?

## Inspection Results Report (ALL Non-Empty Results) - Scp\_PK 90885 (1962)

Row	Assets	Result	(Note <sup>1</sup> )	Sub-Group	Question #	Question ID	References	Question Text
67.	90885 (1962)	Sat		PRR.OM	27.	AR.RMP.TESTREINSTATE.R	192.603(b) (192.725(a), 192.725(b))	From the review of records, did the operator properly test disconnected service lines?
68.	90885 (1962)	Sat		PRR.OM	28.	MO.GM.ABANDONPIPE.R	192.709(c) (192.727(a), 192.727(b), 192.727(c), 192.727(d), 192.727(e), 192.727(f), 192.727(g))	Do records indicate pipelines and facilities were abandoned or deactivated in accordance with requirements?
69.	90885 (1962)	Sat		PRR.OM	29.	MO.GMOPP.PRESSREGTEST.R	192.709(c) (192.739(a), 192.739(b))	Do records indicate inspection and testing of pressure limiting, relief devices, and pressure regulating stations?
70.	90885 (1962)	Sat		PRR.OM	30.	MO.GMOPP.PRESSREGCAP.R	192.709(c) (192.743(a), 192.743(b), 192.743(c))	Do records indicate testing or review of the capacity of each pressure relief device at each pressure limiting station and pressure regulating station as required?
71.	90885 (1962)	Sat		PRR.OM	31.	DC.METERREGSVC.REGTEST.R		Do records indicate that service regulators have been installed, operated, maintained, tested during initial turn-on and tested when customers experience pressure problems?
72.	90885 (1962)	Sat		PRR.OM	32.	MO.GM.DISTVALVEINSPECT.R	192.603(b) (192.747(a), 192.747(b))	Do records indicate proper



## Inspection Results Report (ALL Non-Empty Results) - Scp\_PK 90885 (1962)

Row	Assets	Result	(Note <sup>1</sup> )	Sub-Group	Qs t #	Question ID	References	Question Text
								inspection of each distribution system valve that might be required in an emergency at intervals not exceeding 15 months, but at least once each calendar year, and prompt remedial action to correct any valve found inoperable?
73.	90885 (1962)	Sat		PRR.OM	34.	MO.GM.IGNITION.R	192.709 (192.751(a), 192.751(b), 192.751(c))	Do records indicate personnel followed processes for minimizing the danger of accidental ignition where the presence of gas constituted a hazard of fire or explosion?
74.	90885 (1962)	Sat		PRR.OM	36.	DC.DPC.FLANGE.R	192.147(a) (192.147(b), 192.147(c))	Do records indicate flanges and flange accessories meet the requirements of 192.147?
75.	90885 (1962)	Sat		PRR.OM	37.	DC.WELDPROCEDURE.WELD.R	192.225(a) (192.225(b))	Do records indicate weld procedures are being qualified in accordance with 192.225?
76.	90885 (1962)	Sat		PRR.OM	38.	DC.WELDPROCEDURE.ESSENTIAL.R		Do records indicate that essential variables were measured and documented when welders and procedures were qualified?

## Inspection Results Report (ALL Non-Empty Results) - Scp\_PK 90885 (1962)

Row	Assets	Result	(Note <sup>1</sup> )	Sub-Group	Qs t #	Question ID	References	Question Text
77.	90885 (1962)	Sat		PRR.OM	39.	TQ.QUOMCONST.WELDER.R	192.227(a) (192.227(b), 192.229(a), 192.229(b), 192.229(c), 192.229(d), 192.328(a), 192.328(b), 192.807(a), 192.807(b))	Do records indicate adequate qualification of welders?
78.	90885 (1962)	Sat		PRR.OM	40.	TQ.QUOMCONST.NDT.R	192.243(b)(2) (192.807(a), 192.807(b), 192.328(a), 192.328(b))	Do records indicate the qualification of nondestructive testing personnel?
79.	90885 (1962)	Sat		PRR.OM	41.	DC.CO.PLASTICJOINTPROCEDURE.R	192.273(b) (192.283(a), 192.283(b), 192.283(c), 192.283(d))	Have plastic pipe joining procedures been qualified in accordance with 192.283?
80.	90885 (1962)	Sat		PRR.OM	42.	DC.CO.PLASTICJOINTQUAL.R	192.285(d) (192.285(a), 192.285(b), 192.285(c), 192.807(a), 192.807(b))	Do records indicate persons making joints in plastic pipelines are qualified in accordance with 192.285?
81.	90885 (1962)	Sat		PRR.OM	43.	DC.CO.PLASTICJOINTINSP.R	192.287 (192.807(a), 192.807(b))	Do records indicate persons inspecting the making of plastic pipe joints have been qualified?
82.	90885 (1962)	Sat		PRR.OM	44.	DC.CO.PLASTICPIPESEP.R		Do records indicate minimum separation requirements are met for plastic pipelines?
83.	90885 (1962)	Sat		PRR.OM	45.	MO.GM.EQUIPPLASTICJOINT.R	192.603(b) (192.756)	Do records indicate equipment used in joining plastic pipe was maintained in accordance with the manufacturer's recommende

## Inspection Results Report (ALL Non-Empty Results) - Scp\_PK 90885 (1962)

Row	Assets	Result	(Note <sup>1</sup> )	Sub-Group	Question #	Question ID	References	Question Text
								d practices or with written procedures that have been proven by test and experience to produce acceptable joints?
84.	90885 (1962)	NA		PRR.OM	46.	MO.GM.RECORDS.R	192.605(b)(1) (192.243(f), 192.709(a), 192.709(b), 192.709(c))	Do records indicate that records are maintained of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test?
85.	90885 (1962)	NA		PRR.OM	47.	MO.GM.MOVEANDLOWER.R		Do records indicate that a study was prepared before moving or lowering a steel gas pipeline as required?
86.	90885 (1962)	NA		PRR.OM	48.	MO.GM.MOVEANDLOWERSURVEY.R		Do records indicate that a leak survey was conducted not more than thirty days after moving and/or lowering a metallic pipeline?
87.	90885 (1962)	Sat		PRR.OM	49.	MO.RW.MARKERSMAPSDRAW.R		Are records sufficient to indicate class location and other areas where pipeline markers are required?
88.	90885 (1962)	Concern		FR.FIELDPIPE	9.	DC.METERREGSVC.CUSTOMETERREGLOC.O	192.351 (192.353(a), 192.353(b), 192.353(c), 192.353(d))	Are meters and service regulators being located consistent with the requirements of 192.353?

## Inspection Results Report (ALL Non-Empty Results) - Scp\_PK 90885 (1962)

Row	Assets	Result	(Note <sup>1</sup> )	Sub-Group	Question #	Question ID	References	Question Text
89.	90885 (1962)	Sat	2	GDIM.IMPL	34.	GDIM.RR.MECHANICALFITTINGDATAIMPL.R	192.1009 (191.12)	Have accurate records been maintained documenting mechanical fitting failures that resulted in hazardous leaks?
90.	90885 (1962)	NA		GDIM.IMPL	35.	GDIM.RR.MECHANICALFITTINGRPTIMPL.R	192.1009 (191.12)	Did the operator report all mechanical fitting failures that resulted in a hazardous leak for the previous calendar year to PHMSA and State authorities, as appropriate, by March 15th of the next calendar year, and did the reports contain the information required by Department of Transportation Form PHMSA F-7100.1-2?
91.	90885 (1962)	Sat		MISCTOPICS.OPTRQU AL	12.	TQ.OO.RECORDS.R	192.807	Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified?
92.	90885 (1962)	Sat	2	MISCTOPICS.PUBAWA RE	11.	EP.ERG.LIAISON.R	192.605(a) (192.615(c)(1) , 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), ADB-05-03)	Do records indicate liaisons established and maintained with appropriate

## Inspection Results Report (ALL Non-Empty Results) - Scp\_PK 90885 (1962)

Row	Assets	Result	(Note <sup>1</sup> )	Sub-Group	Question #	Question ID	References	Question Text
								fire, police and other public officials and utility owners in accordance with procedures?
93.	90885 (1962)	Sat	2	MISCTOPICS.PUBAWARE	13.	PD.PA.LANGUAGE.R	192.616(g) (API RP 1162 Section 2.3.1)	Were materials and messages developed and delivered in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?
94.	90885 (1962)	Sat	2	MISCTOPICS.PUBAWARE	18.	PD.PA.EVALEFFECTIVENESS.R	192.616(c) (API RP 1162 Section 8.4)	Have effectiveness evaluation(s) of the program been performed for all stakeholder groups in all notification areas along all systems covered by the program?
95.	90885 (1962)	NA	2	MISCTOPICS.PUBAWARE	25.	PD.PA.MSTRMETER.R	192.616(j) (192.616(h), API RP 1162 Section 2.7 (Step 12), API RP 1162 Section 8.5)	Do records indicate the public awareness program for a master meter or petroleum gas system operator has met the requirements of Part 192?

1. Result is repeated (N) times in this report due to re-presentation of the question in multiple sub-groups.

Report Parameters: All non-empty Results

Except as required to be disclosed by law, any inspection documentation, including completed protocol forms, summary reports, executive summary reports, and enforcement documentation are for internal use only by federal or state pipeline safety regulators. Some inspection documentation may contain information which the operator considers to be confidential. In addition, supplemental inspection guidance and related documents in the file library are also for internal use only by federal or state pipeline safety regulators (with the exception of documents published in the federal register, such as advisory bulletins). Do not distribute or otherwise disclose such material outside of the state or federal pipeline regulatory organizations. Requests for such information from other government organizations (including, but not limited to, NTSB, GAO, IG, or Congressional Staff) should be referred to PHMSA Headquarters Management.

**Form C 8424**

**UTC Standard Comprehensive Inspection Report  
Intrastate Gas Distribution  
FORM C: State-Specific Requirements**

**\*\* THIS FORM IS REQUIRED FOR USE FOR ALL INTRASTATE GAS DISTRIBUTION OPERATORS. USE IN CONJUNCTION WITH THE "BASELINE RECORDS" and "BASELINE FIELD OBSERVATIONS" MODULE IN THE MOST CURRENT WA-SPECIFIC GD QUESTION SET IN INSPECTION ASSISTANT (IA)**

PRINT Form (select "save and keep working" first)

PHMSA Advisory Bulletins

## Inspector and Operator Information

<b>Inspection ID</b>	<b>Inspection Link</b>	<b>Inspector - Lead</b>	<b>Inspector - Assist</b>
8424	8424	Ritter, Dennis	Norwood, Derek
<b>Operator</b>	<b>Unit</b>	<b>Records Location - City &amp; State</b>	
Cascade Natural Gas Corporation	Shelton	Elma WA	
<b>Inspection Start Date</b>	<b>Inspection Exit Interview Date</b>	<b>Engineer Submit Date</b>	
06-13-2022	06-30-2022		

**You must include the following in your inspection summary:**

- \*Inspection Scope and Summary
- \*Facilities visited and Total AFOD
- \* Summary of Significant Findings
- \* Primary Operator contacts and/or participants

### Inspection Scope and Summary

2022 Shelton unit inspection of CNGC. The unit is located in Mason County, WA and spans from Shelton up to Belfair. Major towns in this unit include Shelton, Allyn and Belfair. This unit has 64.73 miles of distribution main (60 psig MAOP or less) and 38.36 miles of main over 60 psig. There are also 2712 services lines (distinct work order IDs) in this district. This inspection reviewed code required records for reporting, maintenance and operations, cathodic protection, MAOP and field inspection of operator assets. Field assets visited are noted in Form R in the 8424 inspection database. They are also noted in the Attachments to the IA inspection and include, CP test points, rectifiers, casings, regulator stations, bridge patrols, valves and right-of-way patrols.

### Facilities visited and Total AFOD

The records were mostly reviewed remotely using MS Teams and utilizing a secure SharePoint site. Additional records not amenable to remote review, leak surveys and construction records, were reviewed on site in Elma, WA on June 28, 2022. Operator assets and locations visited are recorded on Form R in the Attachments.

Total AFODs: records and field--8 days

Exit Interview conducted on site in Shelton June 30, 2022. Colby Lundstrom CNGC, Wendy McDonough CNGC, Dennis Ritter, WUTC.

### Summary of Significant Findings (DO NOT Discuss Enforcement options)

No significant findings were noted from the inspection. There was one leak re-evaluation that did not occur in 2019 at 112 W Franklin, Shelton, however, that leak has been rectified as the pipe was removed from service in 2022.

### Primary Operator contacts and/or participants

Colby Lundstrom, Manager, Compliance and Operations Programs

Wendy McDonough, Compliance Audit Specialist

### Operator executive contact and mailing address for any official correspondence

Pat Daras, VP Engineering and Ops Services

400 North 4th Street, Bismarck, North Dakota 58501

701-222-7611

## Instructions and Ratings Definitions

### INSTRUCTIONS

S - Satisfactory

U - Unsatisfactory

Area Of Concern

N/A - Not Applicable (does not apply in this inspection)

N/C - Not Checked/Evaluated (was not inspected during this inspection)

### INSPECTION RESULTS

Satisfactory Responses  
**4**

Unsatisfactory Responses  
**0**

Area of Concern Responses  
**0**

Not Applicable Responses  
**4**

Not Checked / Evaluated Responses  
**0**

Satisfactory List  
**3,6,7,8,**  
Unanswered Questions  
**0**

Unsatisfactory List

Area of Concern List

Not Applicable List  
**1,2,4,5,**

Not Checked / Evaluated List

**\*\* If an item is marked Unsat, AOC, N/A, or N/C, an explanation must be included in the "Notes" block for that question, and summarized in the appropriate "Records/Field Observation: Summary of Required Comments" section at the end of this form**

## Mapping Records

### Question #1.

Do records indicate that the operator appropriately addresses discovered mapping errors, including all mapping errors that have resulted in excavation damage?

**Q1 Reference**  
WAC 480-93-018

**1. Result**  
Not Applicable

**Q1. Within Scope of this Inspection:**  
No such event occurred, or condition existed.

### 1. Notes

no mapping error noted on during inspection of patrols, leak surveys

### Question #2.

Do records indicate that the operator's mapping corrections are made in a timely manner and in accordance with the operator's written procedures?

**Q2 Reference**  
WAC 480-93-018

**2. Result**  
Satisfactory

**Q2. Within Scope of this Inspection:**

### 2. Notes

Reviewed SSIP project in Shelton

Service installed 10/27/21 on map April 22, 22

Main installed 12/30/21 on map April 22, 22

## Damage Prevention Records

### Question #3

Do records indicate that the operator has and follows a quality assurance program for monitoring the locating and marking of facilities? Do records show that the operator conducts regular field audits of the performance of locators/contractors and takes action when necessary?

**Q3 Reference:**  
**Operator Internal Performance Measures; PHMSA State Program Guidelines**

**3. Results**  
Not Applicable

**Q3. Within Scope of this Inspection:**  
No such event occurred, or condition existed.

### 3. Notes



CNGC currently uses CNGC personnel for all locating, no contractors. They do not have an audit program as they have not felt a need. They are however starting on a new program Utilisphere which will track all locate timing issues, missed, late, etc, in a central database.

#### Question #4.

Does operator include performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties?

**Q4 Reference 1**  
WAC 480-93-007

**Q4 Reference 2**  
WAC 480-93-013

**Q4 Reference 3:**  
**PHMSA State Program Guidelines**

**4. Result**  
Not  
Applicable

**Q4. Within Scope of this Inspection:**  
No such event occurred, or condition existed.

#### 4. Notes

CNGC does not use contractors

#### Question #5.

Do operator contracted (or organic) locators address performance problems for persons performing locating services through mechanisms such as re-training, process change, or changes in staffing levels?

**Q5 Reference 1**  
WAC 480-93-007

**Q5 Reference 2**  
WAC 480-93-013

**5. Result**  
Satisfactory

**Q5. Within Scope of this Inspection:**

#### 5. Notes

District field managers deal with this on a case by case basis based on issue. Personnel cannot perform locates during the investigation into an issue. Will continue to monitor this at the district level due to union contract requirements around discipline

#### Question #6.

Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates?

**Q6 Reference 1**  
WAC 480-93-007

**Q6 Reference 2**  
WAC 480-93-013

**6. Result**  
Satisfactory

**Q6. Within Scope of this Inspection:**

#### 6. Notes

OPS 800 Operator Qualification Procedure, review completed 5/19/22.

#### Question #7.

Are locating and excavating personnel properly qualified in accordance with the operator's Operator Qualification plan and with federal and state requirements?

**Q7 Reference 1**  
WAC 480-93-007

**Q7 Reference 2**  
WAC 480-93-013

**7. Result**  
Satisfactory

**Q7. Within Scope of this Inspection:**

#### 7. Notes

Charles Jenkins 192.0801.018/20/20-4/27/23

Kevin Berner

Locate Ticket 20221952 Belfair Water District 383 Romance Hill Belfair 6/5/20

Ticket 20255203 141 Westfield Shelton Kevin Berner

Ticket 21219747 5/18/21 104 E Springfield Lp Shelton James Robertson OQ 192.0801.01 9/19/19-8/16/22

Ticket 21261200 Cody Bridges SR 300 Belfair 6/10/21

Ticket 22154364 291 Berry Ridge Shelton C Jenkins 4/13/22

#### Question #8.

Do records indicate that the operator has and follows a procedure for leaks caused by excavation damage near buildings such that the procedure adequately addresses the possibility of multiple leaks and underground migration of gas into nearby buildings/structures?

**Q8 Reference:****PHMSA State Program  
Guidelines  
Operator Internal  
Performance  
Measures****8. Result**

Satisfactory

**Q8. Within Scope of this Inspection:****8. Notes**

OPS 617 Outside Leak Investigation Pinpointing and Grading

Section 3 Pinpointing

3.3 Barholing

3.3.1 outside wall of building, need to check inside

**Records: Summary of Required Comments**

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**RECORDS REVIEW SUMMARY: Comments are required for any rating other than "Satisfactory". Summarize the "Notes" blocks above, and ensure you annotate the question number for each comment.**

No issues noted from inspection

**Field: Summary of Required Comments**

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**FIELD OBSERVATION SUMMARY: Comments are required for any rating other than "Satisfactory". Summarize the "Notes" blocks above, and ensure you annotate the question number for each comment.**

two regulator vents too close to structure vents-- brought to operator's attention. Not a retroactive code, not a violation.