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September 5, 2023

Scott Rukke – Pipeline Safety Director
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Subject: CNGC response to probable violation RE: Comprehensive inspection June 13, 2023, through June 16, 2023 (Insp. No. 8583).

Dear Mr. Rukke,

This letter is intended to address one probable violation stemming from a records inspection of Cascade Natural Gas Corporation's (CNGC) Aberdeen District on June 13, 2023, through June 14, 2023.

PROBABLE VIOLATION

1. WAC 480-93-180 Plans and procedures/

(1) Each gas pipeline company must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the gas pipeline company's system. The manual must include plans and procedures for meeting all applicable requirements of 49 C.F.R. §§ 191, 192 and chapter 490-93 WAC, and any plans or procedures used by a gas pipeline company's associated contractors.

Finding(s):

According to records:

W/O #10826969 -328 W Railroad Ave #B -Natural Gas Service – Requirement finish by: 7/19/2020

Finished:12/15/21

Staff noted that W/O #10826969 identified corrosion found below the meter stop on the riser during an AC survey, with the repair being completed over one year later contrary to procedures, which state that repairs must take place within 90 days.

Cascade Response

CNGC acknowledges the findings brought forth by the WUTC stated above. A service line replacement project was scheduled to be conducted in 2021, which included the replacement of the service line at 328 W Railroad Ave #B in Shelton, WA. Upon identification of corrosion, CNGC conducted a leak survey of the riser, and no leaks were identified. With the condition of the riser not being a hazard to public safety and the upcoming replacement project, CNGC made the decision to postpone permanent repair of the riser. As a precaution, to ensure the utmost safety until the service line was replaced, CNGC completed temporary repair by installing a leak clamp on the riser (see exhibit A). The temporary repair was reviewed and approved by the System Integrity department.

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

Respectfully Submitted,

A handwritten signature in black ink that reads "Pat Darras".

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

Exhibit A

