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December 12, 2023

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

Subject: CNGC response to Probable Violations and Areas of Concern RE: 2023 Natural Gas Standard Comprehensive Inspection – Cascade Natural Gas Corporation – Transmission Unit (Insp. No. 8586).

Dear Mr. Rukke,

This letter is intended to address two (2) probable violations and two (2) areas of concern stemming from a Natural Gas Standard Comprehensive inspection of Cascade Natural Gas Corporation's (CNGC) Transmission Unit from August 8, 2023 to October 5, 2023.

PROBABLE VIOLATIONS

- 1. 49 CFR §192.736(c) Compressor stations: Gas detection.**
(c) Each gas detection and alarm system required by this section must be maintained to function properly. The maintenance must include performance tests.

Finding(s):

CNG did not complete maintenance and performance testing of the gas detection and alarm system at Fredonia Compressor Station as required by 49 CFR 192.736(c) and company procedures.

Compressor Station Operation and Maintenance Procedure (CP #742) specifies that LEL detectors will be tested 4 times each calendar year and Infrared Detectors (Fire Eyes) will be tested twice each calendar year. Based on maintenance records provided by CNGC (Form CP#742), LEL detectors were only tested 3 times in 2021 and 2022 and Fire Eyes were only tested once in 2022.

Cascade Response

CNGC acknowledges the findings brought forth by the WUTC stated above. Training has been provided to Compressor Station Operators on the importance of performing LEL detector and Infrared detector testing as required by procedure. Training included a review of procedure CP 742 Compressor Station Operation and Maintenance and the Compressor Station Maintenance Checklist.

Additionally, CNGC is evaluating future technology solutions for the electronic tracking and documentation of compressor station maintenance.

2. **49 CFR §192.705(b) Transmission lines: Patrolling.**

(b) *The frequency of patrols is determined by the size of the line, the operating pressures, the class location, terrain, weather, and other relevant factors, but intervals between patrols may not be longer than prescribed in the following table:*

<i>Class location of line</i>	<i>Maximum interval between patrols</i>	
	<i>At highway and railroad crossings</i>	<i>At all other places</i>
<i>1,2</i>	<i>7 1/2 months; but at least twice each calendar year</i>	<i>15 months; but at least once each calendar year</i>
<i>3</i>	<i>4 1/2 months; but at least four times each calendar year</i>	<i>7 1/2 months; but at least twice each calendar year</i>
<i>4</i>	<i>4 1/2 months; but at least four times each calendar year</i>	<i>4 1/2 months; but at least four times each calendar year</i>

Finding(s):

Based on patrolling records provided by CNGC, there were several missed patrols including quarterly, semiannual, and annual patrols as required by 49 CFR 192.705. There were at least three locations with records missing for quarterly patrols, nine locations with records missing for semiannual patrols, and three locations with records missing for annual patrols. These included locations in Anacortes, Mount Vernon, Belfair, and Shelton. The missing records were for years 2020, 2021 and 2022.

Cascade Response

CNGC acknowledges the findings brought forth by the WUTC stated above. CNGC has conducted pipeline patrols for the following locations identified to have missing records.

- 8” Anacortes Transmission Line 1 in Burlington (47117-PP-1565848): Semi-annual patrol completed July 27, 2023 – Maximo WO11668668.
- RR Crossing at S March Point Rd and Reservation Rd in Anacortes (47039-PP-1568446): Quarterly patrols completed February 9, 2023 – Maximo WO11518321, June 19, 2023 – Maximo WO11616607, October 5, 2023 – Maximo WO11680385, and October 31, 2023 – Maximo WO11719543.
- 8” Kitsap Transmission Line Right of Way Patrol in Belfair (47087-PP-1527567): Annual patrol completed September 25, 2023 – Maximo WO11659374.
- 8” Kitsap Transmission Line Right of Way Patrol in Shelton (47785-PP-1527552): Annual patrols completed July 21, 2022 – Maximo WO11431099 and October 4, 2023 – Maximo WO11659372.
- 8” Kitsap Transmission Line Right of Way Patrol in Shelton (47785-PP-1527553): Annual patrols completed September 2, 2022 – Maximo WO11431101 and September 23, 2023 – Maximo WO11625038.
- 8” Kitsap Transmission Line Right of Way Patrol in Belfair (47087-PP-1527567): Annual patrols completed July 21, 2022 - Maximo WO11431105 and September 25, 2023 – Maximo WO11659374.
- RR Crossing West of Highway 3 in Belfair (47087-PP-1527554): Semi-annual patrols completed July 22, 2022 – Maximo WO11431113, March 2, 2023 – Maximo WO 11523229, and September 25, 2023 – Maximo WO11684169.
- 8” Kitsap Transmission Line Right of Way Patrol in Belfair (47087-PP-1527556): Semi-annual patrols completed July 22, 2022 – Maximo WO11431112, March 2, 2023 – Maximo WO11523228, and September 25, 2023 – Maximo WO11684168.
- 8” Kitsap Transmission Line Right of Way Patrol in Belfair (47087-PP-1527565): Semi-annual patrol completed July 22, 2022 – Maximo WO11431114, March 2, 2023 – Maximo WO11523230, and September 22, 2023 – Maximo WO11684170.
- 8” Kitsap Transmission Line Right of Way Patrol in Shelton (47785-PP-1527547): Semi-annual patrols completed September 2, 2022 – Maximo WO11431118, February 24, 2023 – Maximo WO11523232, and September 29, 2023 – Maximo WO11684172.
- RR Crossing at R-148 Tie in on McFarland Rd in Burlington (47586-PP-1294066): Semi-annual patrols completed July 28, 2022 – Maximo WO11406668, March 2, 2023 – Maximo WO11498781, and October 5, 2023 – Maximo WO11663250.
- RR Crossing East of Farm to Market Rd on McFarland Rd in Mount Vernon (47586-PP-1293851): Semi-annual patrols completed July 28, 2022 – Maximo WO11406669, March 2, 2023 – Maximo WO11498782, and October 5, 2023 – Maximo WO11663251.

- RR Crossing East of R-148 South of McFarland Rd in Mount Vernon (47586-PP-1293852): Semi-annual patrols completed July 28, 2022 – Maximo WO11406667, March 2, 2023 – Maximo WO11498778, and October 5, 2023 – Maximo WO11663249.
- RR Cross West of 14909 Highway 20 in Mount Vernon (47586-PP-1293850): Semi-annual patrols completed July 28, 2022 – Maximo WO11406666, March 2, 2023 – Maximo WO11498777, and October 5, 2023 – Maximo WO11663248.

Additionally, CNGC performed a review of transmission pipeline patrol locations to ensure patrols are conducted at the frequencies required by §192.705.

AREAS OF CONCERN

1. WAC 480-93-018 Records.

(1) Each gas pipeline company must maintain records sufficient to demonstrate compliance with all requirements of 49 C.F.R. §§ 191, 192 and chapter 480-93 WAC.

Finding(s):

All leak survey records were available but the record keeping process and presentation of records made for an inefficient inspection at times. Staff and CNGC had to meet on at least three separate occasions to fully complete the leak survey records review. Staff recommend CNGC seek opportunities to improve the recordkeeping process and/or system for leak survey records to ensure an efficient and thorough records review can be completed.

Cascade Response

CNGC will continue to look for solutions to address the inefficiencies with the presentation of records.

2. 49 CFR §192.736(b)

(b) Except when shutdown of the system is necessary for maintenance under paragraph (c) of this section, each gas detection and alarm system required by this section must-

- (1) Continuously monitor the compressor building for a concentration of gas in air of not more than 25 percent of the lower explosive limit; and*
- (2) If that concentration of gas is detected, warn persons about to enter the building and persons inside the building of the danger.*

Finding(s):

CNG’s Compressor Station Operation and Maintenance Form (Form CP #742) does not clearly indicate at what level gas detectors alarmed. 49 CFR 192.736(b) requires that the gas detection and alarm system must monitor for concentrations of gas in air of not more than 25 percent of the lower explosive limit and warn persons about to enter the building and persons inside the building of the danger. It was verified during the field visit to Fredonia Compressor Station that this is the case, but maintenance records are less clear on what concentration was detected and when the system alarmed.

Cascade Response

CNGC acknowledges the findings brought forth by the WUTC stated above. An MOC has been initiated to update the Compressor Station Maintenance Checklist within CP 742 Compressor Station Operation and Maintenance to document the level of gas in air concentration detected when the system alarms.

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