



STATE OF WASHINGTON  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250  
(360) 664-1160 • TTY (360) 586-8203

**CERTIFIED MAIL**

May 24, 2012

Eric Martuscelli  
Vice President-Operations  
Cascade Natural Gas Corporation  
8113 W. Grandridge Blvd  
Kennewick, WA 99336

Dear Martuscelli:

**RE: 2012 Natural Gas Standard Inspection – Cascade Natural Gas Corporation-  
Transmission Line Inspection Unit**

Staff from the Washington Utilities and Transportation Commission (staff) conducted a standard inspection from April 10-13 and April 18, 2012 of Cascade Natural Gas Corporation (CNG), Transmission pipeline facilities. The inspection included a records review and inspection of the pipeline facilities.

Our inspection indicates three probable violations as noted in the enclosed report.

**Your response needed**

Please review the attached report and respond in writing by June 26, 2012. 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 81.88.040, or
- Institute a complaint, seeking monetary penalties, changes in the company's, practices, or other relief authorized by law, and justified by the circumstances, or



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- Consider the matter resolved without further commission action.

If you have any questions or if we may be of any assistance, please contact Dave Cullom at (360) 664-1141. Please refer to the subject matter described above in any future correspondence pertaining to this inspection.

Sincerely,



David D. Lykken  
Pipeline Safety Director

Enclosure

cc. Steve Kessie, Manager-Operations Services, Cascade Natural Gas Corporation

**WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**  
**2012 Natural Gas Pipeline Safety Inspection**  
**Cascade Natural Gas – Transmission Line Inspection Unit**

The following probable violations of WAC 480-93 were noted as a result of the 2012 inspection of the Cascade Natural Gas Corporation – Transmission unit. The inspection included a random selection of records, operation and maintenance, emergency response, inventory and field inspection of the pipeline facilities.

**PROBABLE VIOLATIONS**

1. **WAC 480-93-170 Tests and reports for gas pipelines.**

(10) *Pressure testing equipment must be maintained, tested for accuracy, or calibrated, in accordance with the manufacturer's recommendations. When there are no manufacturer's recommendations, then pressure testing equipment must be tested for accuracy at an appropriate schedule determined by the gas pipeline company. Test equipment must be tagged with the calibration or accuracy check expiration date. The requirements of this section also apply to equipment such as pressure charts, gauges, dead weights or other devices used to test, monitor or check system pressures or set-points.*

**Finding(s):**

On 11/9/2010, the Bremerton District Instrument/Gauge Calibration Report did not have an equipment number listed for some instrument calibration results. Each device that is required to be calibrated needs to have a method to uniquely identify it in order to demonstrate that the equipment was calibrated within the required timeframe.

2. **WAC 480-93-160 Reporting requirements of proposed construction.**

(1) *Each gas pipeline company must file a proposed construction report with the commission at least forty-five days prior to construction or replacement of any segment of a gas transmission pipeline equal to or greater than one hundred feet in length. Emergency repairs are exempt from this section.*

**Finding(s):**

The Sedro Woolley 12 inch project construction report was not available or filed with the commission.

3. **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 CFR §§ 191, 192 and chapter 480-93 WAC, and any plans or procedures used by a gas pipeline company's associated contractors.*

**Finding(s):**

There was no documentation provided that indicated that the operation and maintenance manual annual review occurred within the required time frame as specified in Title 49 CFR Part 192.605(a).