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Pipeline Safety Program

Sean Mayo - Pipeline Safety Director
State of Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
P.O. Box 47250
Olympia, WA 98504-7250

Subject: Response to June 9, 2017 correspondence regarding Investigation Number 7434

Dear Mr. Mayo,

This letter is intended to address the concerns expressed in the June 9, 2017 correspondence regarding Investigation Number 7434. Specifically, we are addressing the steps Cascade Natural Gas Corporation (CNGC) has taken to address the weld quality concerns communicated in the correspondence. The investigation stemmed from an incident that occurred on January 19, 2017 in the Wenatchee, Washington District.

RESPONSE

Concern #1

Please describe CNGC's approach to identifying the potential extent of this threat and confirm what steps CNGC will take to mitigate the threat.

Cascade Response

CNGC will begin to identify the potential extent of the threat by sampling and testing the welds made by the welder that constructed the failed segment of pipeline (CNGC Work Order # 12771). These samples will be compared to welds of a similar vintage to ensure the quality concerns are isolated to the welder.

If the welds indicate additional quality concerns related to the welder's work or the vintage, CNGC will expand the sampling of welds made by the welder and/or the vintage to determine the extent of the threat. Once the extent of the threat has been determined, the DIMP program will be used to assess and prioritize the threat. Construction to replace the failed segment will begin in mid-July and weld sampling will be concurrent with the construction of the new segment.

Concern #2

Staff would also like to know if this incident will cause you to direct a modification of CNGC's Distribution Integrity Management Program (DIMP).

Cascade Response

A modification to the DIMP program is not anticipated at this time. CNGC currently has provisions in our DIMP model to incorporate threats from weld and joint failures. This includes integrating sub-threats related to failed (leaking) welds and welding standards.

Please contact Chris Grissom at (509) 531-6427 with questions or comments.

Respectfully Submitted,

Eric Martuscelli
Vice President, Operations
Cascade Natural Gas Corporation

