On January 21, 2017, at approximately 10:23 AM, CNG called in a state notifiable to WUTC pipeline staff. CNG reported an evacuation of two people due to leaking gas at 221 N. 16th Ave in Yakima, WA. The leak origin is undetermined because the pipeline was never exposed during replacement. Property damage and pipeline maintenance costs caused this incident to reach over $50,000 and became federally reportable, NRC #1226675. It was necessary to obtain an interpretation of the definition of incident by PHMSA.

1/18/17 – 15:21, an outside odor call was reported to CNG personnel for 1610 Monroe Ave. Cascade crews probed the area around the meter, foundation, and service line. No leaks were found. The nearby service at 1608 Monroe Ave. was probed and no gas leaks were found. An odor was detected at a dead tree stump 75 feet from the nearest gas service near 1610 Monroe Ave., the leak was graded to a #2 leak.

1/19/17 – All services on Monroe Ave. between N. 16th Ave. to N. 18th Ave. were surveyed, all services on Browne Ave. between N. 16th Ave. to N. 18th Ave. were surveyed, services from Monroe Ave. to Folsom were also checked (see attached map). Manholes and foundations were also checked in this area, no leaks were found.

1/20/17 – 11:00, the base of the tree stump at 1610 Monroe Ave. was excavated and a 6-inch concrete irrigation pipe was found with a crack in the bell that was leaking natural gas. CNG crews opened up the irrigation pipe and determined that gas was flowing east toward N. 16th

Form H – UTC Incident Investigation Form, Rev. 0, July 1, 2014
UTC Incident Investigation Form

Ave. Crews checked three more locations on the irrigation line and no gas was found. CNG excavated a second location on N. 16th and no leaks were found. Another excavation was made at the corner of N. 16th and Folsom Ave. (221 N. 16th Ave.) and no gas leaks were found at the main. The main from the corner of Folsom and N 16th to the main on the far side of N 16th was probed and elevated gas readings were found. When excavating the 2" steel main at Folsom across N 16th a leak was found at 9:00 am.

1/21/17 - in the middle of N 16th Ave and Folsom Ave which is a two way feed, stopples were installed on N 16th Ave and this stopped the leak from the 2" steel main in N 16th and stopped the flow of gas in the irrigation line at approx..3:12 pm. A new segment of main was installed to replace the segment that was leaking. The gas flow was restored approx.. 8:30 pm on 1/21/17. All work was completed and the road temporarily repaired at 4:00 am on 1/22/17.

This incident was reported to the UTC but was not reported to the NRC since costs had not yet been calculated.

Once the costs were calculated and submitted to the UTC the operator was told that it should be reported to the NRC since costs were in excess of $50,000. The operator disagreed.

On July 31, 2018 a request for interpretation was submitted to PHMSA on whether a distribution leak was considered a reportable incident if the costs exceed $50,000. PHMSA responded on October 4, 2018 that is was reportable and the operator submitted an NRC report on October 5, 2018.

UTC Staff did not respond to this incident because it was not deemed reportable until months after the costs were tabulated.

Causes/Contributing Factors:

The leak origin is undetermined since it was not exposed during the replacement. The gas migrated due to the close proximity of irrigation piping in the road. In addition severe weather conditions and frozen ground made it difficult to pinpoint the exact leak location for several days and caused the gas to migrate.

Regulatory Analysis/ Violations:

There were no violations noted as a result of this incident.

Follow up/ Recommendations:

No follow up actions are recommended. PHMSA has issued an interpretation letter on the definition of incident as a direct result of this incident. It should be clear to regulatory
agencies and operators in the future that they need to report distribution leaks if the repair costs exceed $50,000.

**NOTE:**
A **Pipeline Failure Analysis form 11** was not filled out for this incident. It was not known what the cause of the leak was and the leak was on a distribution line and small in nature. This was only reportable due to the costs of investigating and replacement of a small segment exceeded $50,000.