



Papermakers since 1911.

3320 N. ARGONNE
SPOKANE, WASHINGTON 99212-2099

PHONE 509.924.1911
FAX 509.927.8461

RECEIVED
JUL 18 2012
WASH. UT. & TP COMM

July 16, 2012

Mr. David Lykken
Pipeline Safety Director
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. S.W. P.O. Box 47250
Olympia, WA 98504-7250

Reference: 2012 Natural Gas Pipeline Safety Inspection

Dear Mr. Lykken:

This letter is in response to the WUTC "2012 Natural Gas Pipeline Safety Inspection" performed at Inland Empire Paper Company on May 29th through June 1st of this year. In the report, the WUTC identified four items for IEP to address. Below is IEP's response to each of the four items.

Item 1: National Pipeline Mapping System: *"Updates--A person providing information under subsection (a) shall provide to the Secretary updates of the information to reflect changes in the pipeline facility owned or operated by the person and as otherwise required by the Secretary."*

IEP interprets 49 U.S.C. §60132 "shall provide to the Secretary updates of the information **to reflect changes in the pipeline facility**" as only requiring updates when changes to the pipeline facility have occurred. IEP has not provided an update since the last WUTC inspection as no changes to IEP's pipeline facility have occurred during this period. However, since the WUTC interprets this as requiring NPMS notification annually, regardless of whether any changes have occurred, IEP has added a paragraph in section 3.15 of our Operations and Maintenance Manual stating "Updates to the National Pipeline Mapping System (NPMS) shall be submitted annually."

Item 2: WAC 480-93-170 Tests and reports for pipelines: The pressure gauges used to test the regulator flow set points and lockup have not been calibrated or accuracy checked.

Inland Empire Paper Company

Mr. David Lykken
Page Two
July 16, 2012

IEP has added a section in 4.06 of the Operations and Maintenance Manual stating "All test equipment, including system pressure gauges, used to record and document essential variables during regulator and relief valve inspections shall 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 shall be tested for accuracy at an appropriate schedule determined by the gas pipeline operator. Test equipment shall be tagged with the calibration or accuracy check date or expiration date (where appropriate).

Item 3: WAC 480-93-188 Gas leak surveys: The instrument used to perform the gas leak surveys is accuracy checked using the built in self-test function per the manufacturer's recommendations, but no records of the test were retained.

The instrument used to perform the gas leak survey is accuracy checked using the self-test function on the date of each gas leak survey, so this date serves as the record date for this accuracy check. However, IEP will confirm with its leak survey consultant that the calibration date has been documented in the leak survey report as stated in its Operations and Maintenance Manual, section 4.02 Leak Survey Program, that "records are accurate and complete".

Item 4: WAC 480-93-188 Gas leak surveys: The instrument tracking or identification number used to perform the gas leak surveys was not recorded on the leak survey records.

IEP owns only one 3.59 mile gas line and has used the same leak survey consultant for the past 20 years. The consultant has only one instrument for performing leak surveys, making the identification number intuitive. However, IEP will confirm with its leak survey consultant that the instrument identification number has been documented in the leak survey report as stated in its Operations and Maintenance Manual, section 4.02 Leak Survey Program, that "records are accurate and complete".

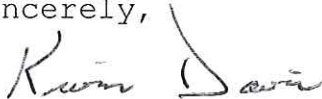
Inland Empire Paper Company

Mr. David Lykken
Page Three
July 16, 2012

IEP has owned and operated its natural gas line since 1989 and has never had a failure, accident, or recordable incident. Through many years of inspections, IEP has always complied with the requests, guidance and requirements of the WUTC in a direct and timely manner. IEP will continue to work cooperatively with the WUTC to operate and maintain its pipeline in the safest possible manner.

If you have any questions, please contact me at 509-924-1911.

Sincerely,

A handwritten signature in cursive script that reads "Kevin Davis". The signature is written in black ink and is positioned below the word "Sincerely,".

Kevin Davis
Production Manager