



STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

621 Woodland Square Loop S.E. • Lacey, Washington 98503

P.O. Box 47250 • Olympia, Washington 98504-7250

(360) 664-1160 • TTY 1-800-833-6384 or 711

Sent Via Email and FedEx

November 19, 2020

Pat Darras
VP, Engineering & Ops Services
Cascade Natural Gas Corporation
400 North 4th Street
Bismarck, ND 58501

RE: 2020 Natural Gas Standard Inspection – Cascade Natural Gas Company – Aberdeen District (Insp. No. 8049)

Dear Mr. Darras:

Staff from the Washington Utilities and Transportation Commission (staff) conducted a Natural Gas Standard inspection of Cascade Natural Gas Company's (CNG), Aberdeen District from October 7, 2020 to November 6, 2020. This inspection included a records review and inspection of certain pipeline facilities.

Our inspection indicates one probable violation as noted in the enclosed report.

Your response needed

Please review the attached report and respond in writing by December 21. 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 81.04.405](#); or
- Issue a complaint under [RCW 81.88.040](#), seeking monetary penalties, changes in the company's practices, or other relief authorized by law, and justified by the circumstances.

Any pipeline company that violates any pipeline safety provision of any commission order, or any rule in this chapter including those rules adopted by reference, or chapter [81.88](#) RCW is subject to a civil penalty not to exceed \$213,268 for each violation for each day that the violation persists. The maximum civil penalty for a related series of violations is \$2,132,679; or

- Consider the matter resolved without further commission action.

We have not yet decided whether to pursue a penalty or complaint in this matter. Should the commission decide to assess a penalty or initiate a complaint, your company will have an opportunity to respond and formally present its position.

If you have any questions or if we may be of any assistance, please contact Scott Rukke at (360) 870-4923. Please refer to the subject matter described above in any future correspondence pertaining to this inspection.

Sincerely,

Sean C. Mayo
Pipeline Safety Director

Enclosure

cc: Josh Sanders, Dir, Ops Policy & Procedures, CNGC
Mike Schoepp, Dir, Operations Services, CNGC
Ryan Privratsky, Dir, System Integrity, Integrity Management, CNGC

UTILITIES AND TRANSPORTATION COMMISSION
2020 Natural Gas Pipeline Safety Inspection
Cascade Natural Gas Co. – Aberdeen District

The following probable violation of Title 49 CFR Part 192 was noted as a result of the 2020 standard inspection of Cascade Natural Gas Company's Aberdeen District. The inspection included a random selection of records, operation and maintenance (O&M), emergency response, inventory, and field inspection of the pipeline facilities.

PROBABLE VIOLATIONS

1. **49 CFR §192.465(b). External corrosion control: Monitoring.**
(b) Each cathodic protection rectifier or other impressed current power source must be inspected six times each calendar year, but with intervals not exceeding 2 1/2 months, to ensure that it is operating.

Finding(s):

Records indicate that CNG conducted their Aberdeen District rectifier inspections on 04/08/2019 and again on 06/28/2019. The following rectifiers exceeded 2-1/2 months between inspections:

- a. Aberdeen rectifier #1 located at Tecumseh west of Young.
- b. Aberdeen rectifier #2 located at Morgan and Wooding.
- c. Hoquiam rectifier #3 located at Wood Ave and Marion St.
- d. Hoquiam rectifier #4 located at Simpson Ave and 11th St.
- e. Montesano rectifier #5 located at Elma and Satsop S.
- f. Montesano rectifier #6 located at Cascade Ln. HP line.
- g. Elma rectifier #12 located at N. 16th St north of W. Young St.
- h. Elma rectifier #13 located at Stamper Rd and Upper Falls Creek Rd.
- i. McCleary rectifier #8 located at S. 7th and W. Fir.
- j. Shelton rectifier #9 located at Delaware and Harvard.
- k. Shelton rectifier #10 located at King St and E. F St.
- l. Shelton rectifier #14 located at E. Andrews Drive @ 009-R-019.

NOTE:

In addition to 49 CFR §192.465(b), CNG procedure CP 755, Section 8.6.2.1, requires rectifier inspections to be conducted between the 1st and 15th of the month that the survey is due.