



STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

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Sent Via Email and FedEx

October 13, 2020

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

RE: 2020 Natural Gas Transmission Inspection – Cascade Natural Gas Co. – (Insp. No. 8052)

Dear Mr. Darras:

Staff from the Washington Utilities and Transportation Commission (staff) conducted a Natural Gas Transmission inspection of Cascade Natural Gas Co. (CNG) from January 29, 2020 to August 10, 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 November 16, 2020. 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 Transmission Pipeline Safety Inspection
Cascade Natural Gas Co. Headquarters

The following probable violation was noted as a result of the 2020 inspection of Cascade Natural Gas Company's Transmission System(s). The inspection included a review of records, operation and maintenance (O&M) procedures, emergency response, and a field inspection of certain pipeline facilities.

PROBABLE VIOLATION

1. **49 CFR §191.29 National Pipeline Mapping System.**

(a) Each operator of a gas transmission pipeline or liquefied natural gas facility must provide the following geospatial data to PHMSA for that pipeline or facility:

(1) Geospatial data, attributes, metadata and transmittal letter appropriate for use in the National Pipeline Mapping System. Acceptable formats and additional information are specified in the NPMS Operator Standards Manual available at www.npms.phmsa.dot.gov or by contacting the PHMSA Geographic Information Systems Manager at (202) 366-4595.

(2) The name of and address for the operator.

(3) The name and contact information of a pipeline company employee, to be displayed on a public Web site, who will serve as a contact for questions from the general public about the operator's NPMS data.

(b) The information required in paragraph (a) of this section must be submitted each year, on or before March 15, representing assets as of December 31 of the previous year. If no changes have occurred since the previous year's submission, the operator must comply with the guidance provided in the NPMS Operator Standards manual available at www.npms.phmsa.dot.gov or contact the PHMSA Geographic Information Systems Manager at (202) 366-4595.

Finding(s):

Cascade Natural Gas (CNG) has a segment of pipeline between their Shelton Gate Station and Bremerton Transmission pipeline that meets the functional definition of Transmission found in 49 CFR §192.3(1).

Transmission line means a pipeline, other than a gathering line, that: (1) Transports gas from a gathering line or storage facility to a gas distribution center, storage facility, or large volume customer that is not down-stream from a gas distribution center; (2) operates at a hoop stress of 20 percent or more of SMYS; or (3) transports gas within a storage field.

This segment of pipeline was not submitted to the NPMS as Transmission as required by 49 CFR §191.29.

The segment consists of approximately 3.8 miles of 12.75-inch, X-52, 0.375-inch pipeline with an MAOP of 499 psig. The pipeline operates at approximately 16.31% of the specified minimum yield strength (SMYS). Since this pipeline operates below 20% of the SMYS, CNG classifies it as high pressure distribution.

Although the pipeline operates below 20% of the SMYS, staff believes it meets the functional definition of transmission because it is tied into transmission on both ends and is the sole source of supply for approximately 35 miles of transmission pipeline that operates above 20% of the SMYS.¹ Staff believes that this particular line, from the tap off of the interstate pipeline to the end point in the City of Bremerton, is a continuous transmission line transporting gas to multiple distribution centers along its route.²

¹ Interpretation PI-18-0001, September 27, 2018

² Interpretation PI-74-0114 dated May 8, 1974.