



STATE OF WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION

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*Sent Via Email and FedEx*

July 8, 2020

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

**RE: 2020 Natural Gas Investigation– Cascade Natural Gas Corporation (CNGC) –  
Bremerton District – (Insp. No. 8203)**

Dear Mr. Darras:

Staff from the Washington Utilities and Transportation Commission (staff) initiated a random field crew inspection on May 28, 2020 at 6228 Illahee Road NE in Bremerton. The inspection included a review of foreman and gas fitter qualification, field procedures and operating standards, pressure test on the service pipeline, and an equipment calibration audit.

Our investigation indicates one (1) probable violation and one (1) area of concern as noted in the enclosed report, which unless corrected, could potentially lead to future violation of state and/or federal pipeline safety rules.

**Your response needed**

Please review the attached report and respond in writing by August 10, 2020. The response should include how and when you plan to bring the probable violation and area of concern into full compliance. Your response should also include a description of how CNGC intends to validate any work completed using the equipment in question between the equipment's last valid calibration date and May 28, 2020.

**What happens after you respond to this letter?**

The attached report presents staff's decision on the area of concern and does not constitute a finding of probable violation by the staff at this time. If this issue is not resolved this matter may result in the issuance of a notice of probable violation.

Respect. Professionalism. Integrity. Accountability.

If you have any questions or if we may be of any assistance, please contact Anthony Dorrrough at (360) 481-4035. Please refer to the subject matter described above in any future correspondence pertaining to this inspection.

Sincerely,

Sean C. Mayo  
Pipeline Safety Director

cc: Kendall Youngblood, District Operations Manager-Bremerton, CNGC  
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**  
**Incident Investigation (Insp. #8203)**  
**6228 Illahee Road NE, Bremerton, WA**

The following probable violation and area of concern of Title 49 CFR Part 192 were noted as a result of our random field crew inspection. Our investigation included interviews with personnel on site, requests for personnel and equipment records and a procedures review.

**PROBABLE VIOLATIONS**

**1. 49 CFR §192.605(a) Procedural manual for operations, maintenance, and emergencies**

*(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.*

**Finding(s):**

CNGC failed to follow written procedures.

**OPS 501 Equipment calibration maintenance and testing**

2.5 – If an instrument is assigned to an employee that is planning to be on vacation or on an extended leave or absence when the instrument is due for calibration, the employee must provide the instrument to a responsible individual who has been designated by district or department management to perform the calibration per. the MDUG Instrument Calibration Requirement List. This responsible person shall see that the instrument is calibrated as required and the record of such calibration is maintained.

Staff noted during the inspection that the gas scope, pyrometer, voltmeter, half-cell, and gauges found on the crew truck were out of calibration. Crew personnel on site indicated that the service truck and equipment had recently been out of service for an extended period of time.

**AREA OF CONCERN**

**1. 49 CFR §192.605(a) Procedural manual for operations, maintenance, and emergencies**

*(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate*

*parts of the manual must be kept at locations where operations and maintenance activities are conducted.*

**Finding(s):**

CNGC failed to provide documentation that instruments found out of calibration were not used on company facilities.

**OPS 501 Equipment calibration maintenance and testing**

2.4 – An instrument cannot be used on company facilities if it has not been calibrated or it's calibration has expired.