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August 24, 2022

Sean Mayo – Pipeline Safety Director
Washington Utilities and Transportation Commission
PO Box 47250
Olympia, WA 98504-7250

Subject: CNGC response to Areas of Concern RE: Standard inspection on June 14, 2022, through June 30, 2022 (Insp. No. 8424).

Dear Mr. Mayo,

This letter is intended to address one area of concern stemming from a Standard inspection of Cascade Natural Gas Corporation's (CNGC) Shelton Unit on June 14, 2022, through June 30, 2022.

AREAS OF CONCERN

1. WAC 480-93-18601 Leak Classification and action criteria-Grade-Definition-Priority of repair.

- (3) A "Grade 3 leak" A "Grade 3 leak" is a leak that is not hazardous at the time of detection and can reasonably be expected to remain not hazardous.
- (a) Each gas pipeline company should reevaluate Grade 3 leaks during the next scheduled survey, or within fifteen months of the reporting date, whichever occurs first, until the leak is regraded or no longer results in a reading.

Summary of Finding(s):

During the records review, a leak record for 112 W Franklin St. Shelton, WA was missing the required annual reevaluation from the year 2019 for a leak found in 2017. Reevaluations were found for 2020 and 2021. The pipe was replaced in 2022. CNGC must be diligent in ensuring required inspections for leaks are carried out in a timely manner and the results recorded for subsequent regulatory inspections.

Cascade Response

CNGC acknowledges the findings brought forth by the WUTC stated above. CNGC CP 750 – *Outside Leak Investigation* was retired and replaced with MDU Utilities Group (MDUG) procedure OPS 617 – *Outside Leak Investigation, Pinpointing, and Grading* on March 1, 2021. OPS 617 requires Grade 2 leaks to be repaired in 6 months from the date the leak was discovered and requires Grade 3 leaks be repaired or cleared within 15 months from the date the leak was discovered. Field Operations is responsible for managing leaks, coordinating and/or scheduling repair by the specified time frames outlined within OPS 617.

CNGC will continue to evaluate future technology solutions for the electronic tracking and documentation of leaks.

Please contact Josh Sanders at (701) 222-7773 with questions or comments.

Respectfully Submitted,

A handwritten signature in black ink that reads "Pat Darras".

Pat Darras
Vice President, Engineering & Operations Services
Cascade Natural Gas Corporation