



STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

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Sent Via Email

July 25, 2022

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

RE: 2022 Natural Gas Standard Inspection – Cascade Natural Gas Corporation Shelton Unit – (Insp. No. 8424)

Dear Mr. Darras:

Staff from the Washington Utilities and Transportation Commission (staff) conducted a Standard inspection of Cascade Natural Gas Corporation's (CNGC) Shelton Unit from June 14, 2022 to June 30, 2022. This inspection included a records review and inspection of pipeline facilities.

Our inspection indicates one 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 26, 2022. The response should include how and when you plan to bring the area of concern into full compliance.

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 the issue is resolved within 60 days of discovery.

If this issue is not resolved within 60 days, this matter may result in the issuance of a notice of probable violation.

Cascade Natural Gas Corporation
2022 Standard Inspection Shelton Unit
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If you have any questions or if we may be of any assistance, please contact Dennis Ritter at (360) 402-0066. 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: Mike Schoepp, Director, Operations Services, CNGC
Josh Sanders, Director, Ops Policy and Procedures, CNGC
Ryan Privratsky, Director, System Integrity, Integrity Management, CNGC

UTILITIES AND TRANSPORTATION COMMISSION
2022 Natural Gas Pipeline Safety Inspection
Cascade Natural Gas Corporation - Shelton Unit

The following areas of concern of WAC 480-93-18601(3)(a) were noted as a result of the 2022 inspection of the CNGC Shelton Unit. The inspection included a random selection of records, operation and maintenance (O&M), emergency response, inventory, and field inspection of the pipeline facilities.

AREA OF CONCERN

1. **WAC 480-93-18601 Leak Classification and action criteria-Grade-Definition-Priority of repair**
(3) 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.

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.