



EverLine
9720 Cypresswood Drive, Suite 360
Houston, TX 77070

July 26, 2024

Scott Rukke
Pipeline Safety Director
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

pipelineprogram@utc.wa.gov

Dear Mr. Rukke,

This letter is to formally respond to the Commission's findings from the 2024 Bio-Gas Transmission Pipeline Safety Inspection of J.R. Simplot Company. Please see our response to the specific area of concern below.

1. **WAC 480-93-180 Plans and Procedures, and WAC 480-93-160 Reporting Requirements of proposed Construction.**

Although as noted Simplot has not performed any pipeline construction or replacement projects, we recognize the need to have procedures in place in the event such a project is needed. Simplot, through their compliance services partner EverLine, has developed and implemented a procedure to file a proposed construction report as required by WAC 480-93-160. The procedure can be found under Section 4.12 of the Simplot O&M Manual (attached).

We hope that these efforts demonstrate Simplot's continued commitment to pipeline safety. We appreciate the time and effort of the Commission and look forward to working with you to ensure our compliance with all applicable regulations. Should you have any questions or need any further information, please contact me at (719) 639-6639 or doug.erickson@everlineus.com.

Sincerely,

Doug Erickson

Doug Erickson
Compliance Program Manager
Everline Compliance, LLC

