

*Todd Gatewood
Vice President and General Manager
Brightmark RNG*

November 3, 2025

Dennis Ritter
Acting Director, Pipeline Safety
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

RE: 2025 Natural Gas Inspections – Augean RNG, LLC

Dear Mr. Ritter,

This letter is in response to the findings from the 2025 Natural Gas Pipeline Inspection of Augean RNG, LLC (“Augean RNG”) pipeline. Brightmark is the owner of the Augean RNG pipeline and has established EverLine as its pipeline compliance services partner and who have assisted with our response to the specific findings as follows:

Inspection 8979 – Operations & Maintenance

49 CFR §192.313 Bends and Elbows

Finding: Procedures require field bends to comply with §192.313 (a), (b), and (c). The procedure does not require field bends to comply with §192.313(d).

Response: Augean RNG has updated Section 15.17 of the O&M Manual to address bending of plastic pipe.

WAC 480-93-160 Reporting Requirements of Proposed Construction

Finding: Augean RNG does not have a process to file a proposed construction report should it become necessary.

Response: Augean RNG has added Section 4.18 to the O&M Manual to address this reporting requirement.

WAC 480-93-200 Reporting Requirements

Finding: Pipeline Operations Maintenance & Emergency Manual Section 18.10 Damage Reporting references using the Damage Reporting Tool reference with no time limits for completion.

Response: Augean RNG has updated Section 18.10 of the O&M Manual to include the reporting timeline.

WAC 480-93-178 Protection of Plastic Pipe

Finding: Procedures do not have sufficient detailed procedures to ensure protection of plastic pipe in accordance with WAC 480-93-178.

Response: Augean RNG has added Section 15.22 to the O&M Manual to address the requirements of WAC 480-93-178.

WAC 480-93-013 Covered Tasks

Finding: Operator Qualifications Section 8.1 Augean RNG Covered Tasks List. The covered tasks list cover line locating and backfilling but not digging/excavation.

Response: Augean RNG will adopt the ASME B31Q covered task list and will update Section 8.1 of the OQ Manual to reflect the updated task list.

49 CFR §192.615 Emergency plans

Finding: Section 19.12 Emergency Personnel & Equipment states that Williams Northwest Pipeline will be their emergency contractor, which is incorrect.

Response: Augean RNG has updated Section 19.12 of the O&M Manual to specify the availability of emergency equipment and moved Williams Northwest Pipeline contact information to Section 19.13.

Inspection 8980 – Standard Gas Transmission

49 CFR §192.171 Compressor stations: Additional safety equipment

Finding: Compressor Station facility does not have any fire protection system. Compressor Station must have adequate fire protection facilities.

Response: Fire extinguishers have been added to the Compressor Station facility.

49 CFR §192.195 Protection against accidental overpressuring

Finding: Pressure relieving devices are installed and meet the requirements of 192.199 and 192.201 on the 4-inch, polyethylene (PE) pipeline running from Augean RNG Regulator station (fed from Williams Pipeline) to the Dairy Farm. No devices are installed on the 6-inch PE pipeline running from the Dairy Farm to the Augean RNG compressor station. The 6-inch PE pipeline has a MAOP of 125 psig and the Dairy Farm system has the ability to produce pressure up to 136 psig. The pipeline must have a pressure relieving device to protect the integrity of the pipeline in case of failure of the pressure regulating device.

Response: Brightmark has lowered the maximum pressure limit of the Dairy Farm compressors to 125 PSIG. This reduction in operating set point, combined with the active pressure regulator at the inlet of the line provides two forms pressure monitoring and regulation.

49 CFR §192.731 Compressor stations: Inspection and testing of relief devices

Finding: Compressor relief/limiting devices have not been tested as required. Compressor station relief/limiting devices must be inspected and tested in accordance with §192.739 and §192.743.

Response: EverLine performed inspection and testing of compressor station relief valves on October 9, 2025. Inspection results are attached to this letter. Annual inspection and testing have been added to EverLine's scope of work.

RCW 19.122.030 (3)(a)(i)

Finding: While driving the R/W, we found an excavation in the process of being backfilled near the pipeline and discovered the locate request had been missed by Everline who does the locating for Augean RNG pipeline. Augean RNG did not provide the excavator with reasonably accurate information by marking the facility location.

Response: EverLine personnel on site when the excavation was found performed a leak survey to verify that no gas was detected in the excavation area. EverLine and Augean RNG worked with the One-Call Center to ensure that all future One-Call tickets are sent to both parties. All One-Call tickets received since the audit are attached, including the response.

Inspection 8981 – Section 114

49 U.S.C. 60108(a)(1) section 114 of the PIPES Act of 2020

Finding: Augean RNG does not have a written plan to minimize fugitive natural gas losses when operating or maintaining their compressor.

Response: EverLine has added Section 6.12 to the O&M Manual to address fugitive emissions when operating and maintaining compressors.

The following supporting documentation is attached to this letter:

- Augean RNG O&M Manual (revised October 18, 2025);
- AOC report for excavation near pipeline during audit (August 6, 2025);
- All One-Call tickets received since Audit (3 total);
- Completion detail report for one-call tickets;
- Compressor station relief valve inspection reports (completed October 9, 2025).



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We hope that these efforts demonstrate Augean RNG's continued commitment to pipeline safety. We appreciate the time and effort of the UTC 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 Bruce Johnson at bruce.johnson@brightmark.com or 815-378-9049.

Sincerely,

Todd Gatewood
Vice President and General Manager
Brightmark RNG