



STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

621 Woodland Square Loop S.E. • Lacey, Washington 98503

P.O. Box 47250 • Olympia, Washington 98504-7250

(360) 664-1160 • TTY 1-800-833-6384 or 711

Sent via email

October 1, 2025

Gerrud Wallaert
Chief Operations Officer of RNG
Augean RNG
1725 Montgomery St.
San Francisco, CA 94111

RE: 2025 Natural Gas Standard Gas Transmission Inspection – Augean RNG – (Insp. No. 8980)

Dear Mr. Wallaert:

Staff from the Washington Utilities and Transportation Commission (staff) conducted a Natural Gas Standard Gas Transmission inspection of Augean RNG from August 4, 2025, to September 17, 2025. This inspection included a records review and inspection of the pipeline facilities.

Our inspection indicates four probable violation(s) as noted in the enclosed report.

Your response needed

Please review the attached report and respond in writing by November 3, 2025. The response should include how and when you plan to bring the probable violations into full compliance.

What happens after you respond to this letter?

The attached report presents staff's decision on probable violations and does not constitute a finding of violation by the commission at this time.

After you respond in writing to this letter, there are several possible actions the commission, in its discretion, may take with respect to this matter. For example, the commission may:

- Issue an administrative penalty under [RCW 81.04.405](#); or
- Issue a complaint under [RCW 81.88.040](#), seeking monetary penalties, changes in the company's practices, or other relief authorized by law, and justified by the circumstances. Any pipeline company that violates any pipeline safety provision of any commission order, or any rule in this chapter including those rules adopted by reference, or chapter [81.88](#) RCW is subject to a civil penalty not to exceed \$272,926 for each violation for

Augean RNG
2025 Standard Gas Transmission Inspection, Insp. No. 8980
October 1, 2025
Page 2

each day that the violation persists. The maximum civil penalty for a related series of violations is \$2,729,245; or

- Consider the matter resolved without further commission action.

We have not yet decided whether to pursue a penalty or complaint in this matter. Should the commission decide to assess a penalty or initiate a complaint, your company will have an opportunity to respond and formally present its position.

If you have any questions or if we may be of any assistance, please contact Tom Green at (360) 827-0483. Please refer to the subject matter described above in any future correspondence pertaining to this inspection.

Sincerely,

Dennis Ritter
Acting Director, Pipeline Safety

cc: Bruce Johnson, Manager of Pipeline Operations & Maintenance, Augean RNG
Doug Erickson, Compliance Manager, Everline
Dan Evans, Principle, Augean RNG
Gary Coppedge, Principle, Augean RNG

UTILITIES AND TRANSPORTATION COMMISSION
2025 Natural Gas Pipeline Safety Inspection
Augean RNG

The following probable violation(s) of Title 49 CFR Part 192 and RCW 19.122.030(3)(a)(i) were noted as a result of the 2025 inspection of the Augean RNG. The inspection included a random selection of records, operation and maintenance (O&M), emergency response, inventory, and field inspection of the pipeline facilities.

PROBABLE VIOLATIONS

1. 49 CFR §192.171 Compressor stations: Additional safety equipment.

(a) Each compressor station must have adequate fire protection facilities. If fire pumps are a part of these facilities, their operation may not be affected by the emergency shutdown system.

Finding(s):

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

2. 49 CFR §192.195 Protection against accidental overpressuring.

(a) General requirements. Except as provided in [§ 192.197](#), each pipeline that is connected to a gas source so that the maximum allowable operating pressure could be exceeded as the result of pressure control failure or of some other type of failure, must have pressure relieving or pressure limiting devices that meet the requirements of [§§ 192.199](#) and [192.201](#).

Finding(s):

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.

3. 49 CFR §192.731 Compressor stations: Inspection and testing of relief devices.

(a) Except for rupture discs, each pressure relieving device in a compressor station must be inspected and tested in accordance with [§§ 192.739](#) and [192.743](#), and must be operated periodically to determine that it opens at the correct set pressure.

Finding(s):

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.

4. **RCW 19.122.030 (3)(a)(i)**

(3) Upon receipt of the notice provided for in subsection (1) of this section, a facility operator must, with respect to:

(a)(i) The facility operator's locatable underground facilities, provide the excavator with reasonably accurate information by marking facility location. Hazardous liquid and gas pipeline operators are required to locate all facilities in accordance with Title 49 C.F.R. Secs. 195.442(c)(4) through (6) and 192.614(c)(4) through (6) as they existed on July 27, 2025, or such subsequent date as may be provided by the commission by rule, consistent with the purpose of this section. This information must be provided free of charge subject to the limitations in subsections (6)(b) and (8) of this section, and the grant of authority in subsection (11) of this section;

Finding(s):

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.