



STATE OF WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION

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*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 Section 114 Inspection– Augean RNG – (Insp. No. 8981)**

Dear Mr. Wallaert:

Staff from the Washington Utilities and Transportation Commission (staff) conducted a Section 114 inspection of Augean RNG from July 17, 2025, to September 17, 2025. 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 November 3, 2025. 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 30 days of this letter.

If this issue is not resolved within 30 days, this matter may result in the issuance of a notice of probable violation.

Augean RNG  
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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

Enclosure

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

**AREA OF CONCERN**

1. **49 U.S.C. 60108(a)(1) section 114 of the PIPES Act of 2020**  
*Section 114 of the PIPES Act of 2020 amended the pipeline safety statutes at 49 United States Code (U.S.C) 60108. Section 60108(a)(1) requires each person owning or operating a gas pipeline facility or hazardous liquid pipeline to carry out a written inspection and maintenance plan. Section 114 of the PIPES Act of 2020 contains self-executing provisions that require pipeline operators to update these inspection and maintenance plans to address eliminating hazardous leaks and minimizing releases of natural gas. Section 114 also added a requirement that the inspection and maintenance plans address replacement or remediation of pipelines known to leak due to their material, design, or past operating and maintenance history.*

**Finding(s):**

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