



8113 W. GRANDRIDGE BLVD., KENNEWICK, WASHINGTON 99336-7166
TELEPHONE 509-734-4500 FACSIMILE 509-737-9803
www.cngc.com

June 20, 2025

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

Subject: CNGC response to Probable Violation RE: Natural Gas Standard Records and Field Inspection from April 8, 2025 through April 24, 2025 (Insp. No. 8998).

Dear Mr. Rukke,

This letter is intended to address two probable violations stemming from a Standard Records and Field Inspection of Cascade Natural Gas Corporation's (CNGC) Bremerton District from April 8, 2025, through April 24, 2025.

PROBABLE VIOLATIONS

1. WAC 480-93-186 Leak evaluation.

(3) The gas pipeline company must check the perimeter of the leak area with a combustible gas indicator. The gas pipeline company must perform a follow-up inspection on all leak repairs with residual gas remaining in the ground as soon as practical, but not later than thirty days following the repair.

Finding(s):

- (1) 629 Highlands, Bremerton had a missed leak survey follow-up after residual gas was remaining on 5/12/2022. The follow up occurred on 1/20/2023.

- (2) 1140 Marine Drive, Bremerton had a missed leak survey follow-up after residual gas was remaining on 7/14/2023. The follow up occurred on 9/12/2023.

Cascade Response

CNGC acknowledges the findings brought forth by the WUTC stated above. As a result of the findings, CNGC's Quality Control department is conducting an evaluation of 293 *Leak Investigation Record* forms for all districts. Based on the evaluation, CNGC will determine needed resolutions (e.g., potential procedure revisions, additional training, etc.).

Additionally, CNGC is evaluating technology solutions for the electronic tracking and documentation of follow-up leak investigations.

Please contact Josh Sanders at (701) 222-7773 with questions or comments.

Respectfully Submitted,

A handwritten signature in black ink that reads "Pat Darras".

Pat Darras
Vice President, Engineering & Operations Services
Cascade Natural Gas Corporation