

Inspection Output (IOR)

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Report Filters

Assets All, and including items not linked to any asset.

Results All

Inspection Information

Inspection Name	9031 - NWN Section 114 Review 2025	Operator(s)	NORTHWEST NATURAL GAS CO (13840) Lead Scott Anderson	Plan Submitted	01/09/2025
Status	LOCKED	Observer(s)	David Cullom, Anthony Dorough, Derek Norwood, John Trier, Marina Rathbun, Tom Green, Jason Hoxit, Emma Barrett	Plan Approval	01/14/2025 by Dennis Ritter
Start Year	2025	Supervisor	Dennis Ritter	All Activity Start	05/12/2025
System Type	GD	Director	Scott Rukke	All Activity End	05/15/2025
Protocol Set ID	WA.GD.2024.02			Inspection Submitted	05/15/2025
				Inspection Approval	06/26/2025 by Scott Rukke

Inspection Summary

Inspection Scope and Summary

This inspection consisted of a section 114 review of Northwest Natural's procedures.

Facilities visited and Total AFOD

1 AFOD

Summary of Significant Findings

No findings

Primary Operator contacts and/or participants

Samantha Rookstool, Code Compliance Specialist

Ryan Truair, Sr. Manager of Compliance

Hanna Koonce, Code Compliance Specialist

Andy Fortier, Compliance Engineer

Operator executive contact and mailing address for any official correspondence

Joe Karney

VP, Engineering and Utility Operations

NW Natural

250 SW Taylor St.

Portland, OR 97204

Scope (Assets)

#	Short Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1.	88965 (1,826)	Northwest Natural-HEADQUARTERS	unit	88965	Storage Fields Bottle/Pipe - Holders Vault Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric	16	16	16	16	100.0%

1. Percent completion excludes unanswered questions planned as "always observe".

Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	88965 (1,826)	--	114	P	Detail	--

Plan Implementations

#	Activity Name	SMART Act#	Start Date	End Date	Focus Directives	Involved Groups/Subgroups	Asset Types	Qst Type(s)	Planned	Required	Inspected	Total	Required % Complete
1	Section 114 Questions	--	05/12/2025	05/15/2025	--	all planned questions	all assets	all types	16	16	16	16	100.0%

1. Since questions may be implemented in multiple activities, but answered only once, questions may be represented more than once in this table.

2. Percent completion excludes unanswered questions planned as "always observe".

Forms

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1.	Attendance List	Section 114 Questions	COMPLETED	05/13/2025	Section 114 Questions	88965 (1,826)

Results (all values, 16 results)

32 (instead of 16) results are listed due to re-presentation of questions in more than one sub-group.

114.GD: Section 114 - Gas Distribution

1. Question Result, ID, References Sat, 114.114.LKRLSID.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)

Question Text *Do procedures provide a methodology for identifying sources of fugitive natural gas emissions in the system?*

Assets Covered 88965 (1,826)

Result Notes Leak Surveys are conducted as required

SWP 707 and SP 709

FOM Testing Facilities for Gas Leaks

FOM Investigating Leaks and Odors

2. Question Result, ID, References Sat, 114.114.LKRLSVENT.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)

Question Text *Do procedures identify measures for minimizing natural gas release volumes associated with non-emergency venting and blowdowns from operations and maintenance?*

Assets Covered 88965 (1,826)

Result Notes Engineering Procedures

J-11, 30' Stack Blowdown Flare Trailer, rev. 05, 8/10/22

J-12, Methane Mitigation, rev. 03, 4/29/25

J-16, 10' Stack Blowdown Flare Trailer, rev. 02, 11/1/23

J-17, Blowdown Compression, rev. 01, 11/1/23

3. Question Result, ID, References Sat, 114.114.LKRLSUNEXPCTVENT.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)

Question Text *Do procedures provide for investigation of any unanticipated vented releases of natural gas, and if so, what are the associated actions?*

Assets Covered 88965 (1,826)

Result Notes FOM Investigating Leaks and Odors

FOM Responding to Venting Relief - DR, Primary Service Regulator, Multiple District Regulators

4. Question Result, ID, References Sat, 114.114.LKRLSLKDATA.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)

Question Text *Do procedures include a methodology to collect, retain and analyze detailed information from detected natural gas leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?*

Assets Covered 88965 (1,826)

Result Notes NWN Standard Practices, SPW 709 - Leak Classification and Repair

5. Question Result, ID, References Sat, 114.114.LKRLSDETECTLK.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)

Question Text *Do procedures include instructions for personnel to detect leaks to help further reduce emission in stations and along the right of way?*

Assets Covered 88965 (1,826)

Result Notes FOM Investigating Leaks and Odors

OP 501-02, Investigating Leaks and Odors by Contractor Leakage Surveyors

6. Question Result, ID, References Sat, 114.114.LKRLSIDMITRPR.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)

Question Text *Do procedures define a process to identify, classify, mitigate and repair leaks?*

Assets Covered 88965 (1,826)

Result Notes NWN Standard Practices, SPW 709 - Leak Classification and Repair

FOM Underground Leak Classification Guide

7. Question Result, ID, References Sat, 114.114.LKMITRPRLAUF.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)

Question Text *Do procedures provide for review of Lost & Unaccounted for Gas (LAUF) and do procedures specify actions to reduce the associated volume?*

Assets Covered 88965 (1,826)

Result Notes Engineering Procedure J-12, Methane Mitigation, rev. 03, 4/29/25

FOM Form 1315 Gas Loss Tag

8. Question Result, ID, References **Sat, 114.114.REGSTATIONOM.P, 49 U.S.C. 60108(a)** (also presented in: 114.MM)
 Question Text *Do maintenance or operational procedures contain measures for reduction of natural gas releases from regulators?*
 Assets Covered **88965 (1,826)**
 Result Notes **FOM Responding to Venting Relief - DR, Primary Service Regulator, Multiple District Regulators**
FOM Maintaining Large Meters and Regulator Stations
9. Question Result, ID, References **Sat, 114.114.REGSTATIONCONFIG.P, 49 U.S.C. 60108(a)** (also presented in: 114.MM)
 Question Text *Do maintenance or operational procedures contain measures for identifying potential configuration changes that would reduce natural gas releases from regulators?*
 Assets Covered **88965 (1,826)**
 Result Notes **FOM Maintaining Large Meters and Regulator Stations**
Engineering Procedure J-12, Methane Mitigation, rev. 03, 4/29/25
10. Question Result, ID, References **Sat, 114.114.TESTRELIEFVLV.P, 49 U.S.C. 60108(a)** (also presented in: 114.MM)
 Question Text *Do relief valve testing procedures include measures to minimize natural gas releases?*
 Assets Covered **88965 (1,826)**
 Result Notes **FOM Inspecting and Testing Relief Valves**
OQ 804-01 Inspecting and Testing a Relief Valve
11. Question Result, ID, References **Sat, 114.114.FLARE.P, 49 U.S.C. 60108(a)** (also presented in: 114.MM)
 Question Text *Do procedures for flaring from pipeline facilities for transporting natural gas include measures for minimization of natural gas emissions?*
 Assets Covered **88965 (1,826)**
 Result Notes **Engineering Procedures**
J-11, 30' Stack Blowdown Flare Trailer, rev. 05, 8/10/22
J-16, 10' Stack Blowdown Flare Trailer, rev. 02, 11/1/23
12. Question Result, ID, References **Sat, 114.114.GNLDSGCNCFG.P, 49 U.S.C. 60108(a)** (also presented in: 114.MM)
 Question Text *Do operation and maintenance procedures contain mechanisms for identifying potential design/configuration changes for reducing natural gas releases?*
 Assets Covered **88965 (1,826)**
 Result Notes **Engineering Procedure L-5, Leakage Elimination by Maintenance and Reconstruction of Below Ground Facilities, rev. 02, 12/29/17**
13. Question Result, ID, References **Sat, 114.LEAKPRONE.LKRLS.P, 49 U.S.C. 60108(a)** (also presented in: 114.MM)
 Question Text *What procedures are in place to monitor for and identify pipe segments that are leak-prone, and what criteria (e.g., frequency of leak or failure events) are specified for determining a pipeline segment is leak-prone?*
 Assets Covered **88965 (1,826)**
 Result Notes **No bare steel as of 2018, no vintage plastic as of 2022.**
DIMP Appendix E-4, E-10
14. Question Result, ID, References **Sat, 114.LEAKPRONE.LKRLSLKDATA.P, 49 U.S.C. 60108(a)** (also presented in: 114.MM)
 Question Text *Do procedures include a methodology to collect, retain and analyze detailed information from detected leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?*
 Assets Covered **88965 (1,826)**

NWN Standard Practices, SPW 709 - Leak Classification and Repair

15. Question Result, ID, References Sat, 114.LEAKPRONE.LKMITGRPREXAMPLE.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)
Question Text *Do procedures identify cast iron, unprotected steel, wrought iron, and vintage plastic pipe with known leak issues?*
Assets Covered 88965 (1,826)
Result Notes DIMP Appendices E-4 and E-10. No cast iron, no bare steel as of 2018, no wrought iron, no vintage plastic as of 2022.
16. Question Result, ID, References Sat, 114.LEAKPRONE.LKMITGRPROTHER.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)
Question Text *Do procedures clearly define a process to address replacement or remediation of pipe segments with known leak issues beyond those specifically identified in Section 114?*
Assets Covered 88965 (1,826)
Result Notes DIMP Accelerated action plan for Plexco Celcon service tee caps

FOM Guidelines for Remediating Plexco Service Tee Celcon Caps

114.MM: Section 114 - Master Meter

17. Question Result, ID, References Sat, 114.114.LKRLSID.P, 49 U.S.C. 60108(a) (also presented in: 114.GD)
Question Text *Do procedures provide a methodology for identifying sources of fugitive natural gas emissions in the system?*
Assets Covered 88965 (1,826)
Result Notes Leak Surveys are conducted as required
- SWP 707 and SP 709
- FOM Testing Facilities for Gas Leaks
- FOM Investigating Leaks and Odors
18. Question Result, ID, References Sat, 114.114.LKRLSVENT.P, 49 U.S.C. 60108(a) (also presented in: 114.GD)
Question Text *Do procedures identify measures for minimizing natural gas release volumes associated with non-emergency venting and blowdowns from operations and maintenance?*
Assets Covered 88965 (1,826)
Result Notes Engineering Procedures
- J-11, 30' Stack Blowdown Flare Trailer, rev. 05, 8/10/22
- J-12, Methane Mitigation, rev. 03, 4/29/25
- J-16, 10' Stack Blowdown Flare Trailer, rev. 02, 11/1/23
- J-17, Blowdown Compression, rev. 01, 11/1/23
19. Question Result, ID, References Sat, 114.114.LKRLSUNEXPCTVENT.P, 49 U.S.C. 60108(a) (also presented in: 114.GD)
Question Text *Do procedures provide for investigation of any unanticipated vented releases of natural gas, and if so, what are the associated actions?*
Assets Covered 88965 (1,826)
Result Notes FOM Investigating Leaks and Odors

FOM Responding to Venting Relief - DR, Primary Service Regulator, Multiple District Regulators

20. Question Result, ID, References **Sat, 114.114.LKRLSLKDATA.P, 49 U.S.C. 60108(a)** (also presented in: 114.GD)
 Question Text *Do procedures include a methodology to collect, retain and analyze detailed information from detected natural gas leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?*
 Assets Covered **88965 (1,826)**
 Result Notes **NWN Standard Practices, SPW 709 - Leak Classification and Repair**
21. Question Result, ID, References **Sat, 114.114.LKRLSDETECTLK.P, 49 U.S.C. 60108(a)** (also presented in: 114.GD)
 Question Text *Do procedures include instructions for personnel to detect leaks to help further reduce emission in stations and along the right of way?*
 Assets Covered **88965 (1,826)**
 Result Notes **FOM Investigating Leaks and Odors**
OP 501-02, Investigating Leaks and Odors by Contractor Leakage Surveyors
22. Question Result, ID, References **Sat, 114.114.LKRLSIDMITRPR.P, 49 U.S.C. 60108(a)** (also presented in: 114.GD)
 Question Text *Do procedures define a process to identify, classify, mitigate and repair leaks?*
 Assets Covered **88965 (1,826)**
 Result Notes **NWN Standard Practices, SPW 709 - Leak Classification and Repair**
FOM Underground Leak Classification Guide
23. Question Result, ID, References **Sat, 114.114.LKMITRPRLAUF.P, 49 U.S.C. 60108(a)** (also presented in: 114.GD)
 Question Text *Do procedures provide for review of Lost & Unaccounted for Gas (LAUF) and do procedures specify actions to reduce the associated volume?*
 Assets Covered **88965 (1,826)**
 Result Notes **Engineering Procedure J-12, Methane Mitigation, rev. 03, 4/29/25**
FOM Form 1315 Gas Loss Tag
24. Question Result, ID, References **Sat, 114.114.REGSTATIONOM.P, 49 U.S.C. 60108(a)** (also presented in: 114.GD)
 Question Text *Do maintenance or operational procedures contain measures for reduction of natural gas releases from regulators?*
 Assets Covered **88965 (1,826)**
 Result Notes **FOM Responding to Venting Relief - DR, Primary Service Regulator, Multiple District Regulators**
FOM Maintaining Large Meters and Regulator Stations
25. Question Result, ID, References **Sat, 114.114.REGSTATIONCONFIG.P, 49 U.S.C. 60108(a)** (also presented in: 114.GD)
 Question Text *Do maintenance or operational procedures contain measures for identifying potential configuration changes that would reduce natural gas releases from regulators?*
 Assets Covered **88965 (1,826)**
 Result Notes **FOM Maintaining Large Meters and Regulator Stations**
Engineering Procedure J-12, Methane Mitigation, rev. 03, 4/29/25
26. Question Result, ID, References **Sat, 114.114.TESTRELIEFVLV.P, 49 U.S.C. 60108(a)** (also presented in: 114.GD)
 Question Text *Do relief valve testing procedures include measures to minimize natural gas releases?*
 Assets Covered **88965 (1,826)**
 Result Notes **FOM Inspecting and Testing Relief Valves**
OQ 804-01 Inspecting and Testing a Relief Valve

27. Question Result, ID, References **Sat, 114.114.FLARE.P, 49 U.S.C. 60108(a)** (also presented in: 114.GD)
 Question Text *Do procedures for flaring from pipeline facilities for transporting natural gas include measures for minimization of natural gas emissions?*
 Assets Covered **88965 (1,826)**
 Result Notes **Engineering Procedures**
- J-11, 30' Stack Blowdown Flare Trailer, rev. 05, 8/10/22**
- J-16, 10' Stack Blowdown Flare Trailer, rev. 02, 11/1/23**
28. Question Result, ID, References **Sat, 114.114.GNLD SGNCNFG.P, 49 U.S.C. 60108(a)** (also presented in: 114.GD)
 Question Text *Do operation and maintenance procedures contain mechanisms for identifying potential design/configuration changes for reducing natural gas releases?*
 Assets Covered **88965 (1,826)**
 Result Notes **Engineering Procedure L-5, Leakage Elimination by Maintenance and Reconstruction of Below Ground Facilities, rev. 02, 12/29/17**
29. Question Result, ID, References **Sat, 114.LEAKPRONE.LKRLS.P, 49 U.S.C. 60108(a)** (also presented in: 114.GD)
 Question Text *What procedures are in place to monitor for and identify pipe segments that are leak-prone, and what criteria (e.g., frequency of leak or failure events) are specified for determining a pipeline segment is leak-prone?*
 Assets Covered **88965 (1,826)**
 Result Notes **No bare steel as of 2018, no vintage plastic as of 2022.**
- DIMP Appendix E-4, E-10**
30. Question Result, ID, References **Sat, 114.LEAKPRONE.LKRLSLKDATA.P, 49 U.S.C. 60108(a)** (also presented in: 114.GD)
 Question Text *Do procedures include a methodology to collect, retain and analyze detailed information from detected leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?*
 Assets Covered **88965 (1,826)**
 Result Notes **DIMP Appendix E-4, E-10**
- NWN Standard Practices, SPW 709 - Leak Classification and Repair**
31. Question Result, ID, References **Sat, 114.LEAKPRONE.LKMITGRPREXAMPLE.P, 49 U.S.C. 60108(a)** (also presented in: 114.GD)
 Question Text *Do procedures identify cast iron, unprotected steel, wrought iron, and vintage plastic pipe with known leak issues?*
 Assets Covered **88965 (1,826)**
 Result Notes **DIMP Appendices E-4 and E-10. No cast iron, no bare steel as of 2018, no wrought iron, no vintage plastic as of 2022.**
32. Question Result, ID, References **Sat, 114.LEAKPRONE.LKMITGRPROTHER.P, 49 U.S.C. 60108(a)** (also presented in: 114.GD)
 Question Text *Do procedures clearly define a process to address replacement or remediation of pipe segments with known leak issues beyond those specifically identified in Section 114?*
 Assets Covered **88965 (1,826)**
 Result Notes **DIMP Accelerated action plan for Plexco Celcon service tee caps**
- FOM Guidelines for Remediating Plexco Service Tee Celcon Caps**

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