



STATE OF WASHINGTON  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250  
(360) 664-1160 • TTY (360) 586-8203

Ref. No. Docket PG-080034

**CERTIFIED MAIL**

February 13, 2009

Grant M. Yoshihara  
Vice President, Utility Operations  
Northwest Natural  
220 Northwest Second Avenue  
One Pacific Square  
Portland, OR 97209

Dear Mr. Yoshihara:

**Re: 2008 Standard Inspection of Columbia Gorge Distribution System**

We conducted a natural gas inspection from September 29, 2008 through October 10, 2008 of Northwest Natural's (NWN) Skamania and Klickitat county distribution system. The inspection included a review of maintenance records and a field inspection of the pipeline facilities.

Our inspection indicates a series of two probable violations, as noted in the enclosed report. We also noted one area of concern, which unless corrected, could potentially lead to future violations of state and/or federal pipeline safety rules.

**Your response needed**

Please review the attached report and respond in writing by March 16, 2009. The response should include how and when you plan to bring the probable violations into full compliance. We also request your response to our area of concern.

**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.



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

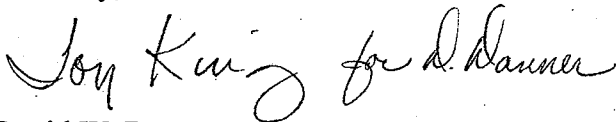
- Consider the matter resolved without further commission action, or
- Assess an administrative penalty under RCW 81.88.040, or
- Issue a complaint, seeking monetary penalties, changes in the company's practices, or other relief authorized by law, and justified by the circumstances.

We have not yet decided whether to pursue a complaint or penalty in this matter. Should an administrative law judge decide to pursue a complaint or penalty, your company will have an opportunity to present its position directly to the commissioners.

If you have any questions, please contact Lex Vinsel at (360) 664-1319. Please refer to docket number PG-080034 in any future correspondence regarding this inspection.

Thank you for your cooperation and interest in pipeline safety.

Sincerely,

A handwritten signature in cursive script that reads "Joy King for D. Danner".

David W. Danner  
Executive Director and Secretary

Enclosure

cc: Anne F. Soiza, Director, Pipeline Safety  
Bruce Paskett, P.E., Northwest Natural

**WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**  
**2008 Natural Gas Pipeline Standard Inspection Report**  
**Northwest Natural – Columbia Gorge Unit Inspection**  
**Docket No. PG-080034**

The following probable violation(s) of WAC 480-93 were noted as a result of the 2008 pipeline safety inspection of Northwest Natural (NWN) Columbia Gorge unit. The inspection included a review of the procedures, records, inventory, and field operations and maintenance of the natural gas facilities located in Klickitat and Skamania Counties.

**PROBABLE VIOLATIONS**

1. **WAC 480-93-124(1)(c) Pipeline Markers**

- (1) *Each gas pipeline company must place pipeline markers at the following locations:*
- (c) *Over mains and transmission lines at river, creek, drainage ditch, or irrigation canal crossings where hydraulic scouring, dredging, or other activity could pose a risk to the pipeline (custom signage may be required to ensure visibility);*

**Charge:**

NWN did not place pipeline markers on either side of Green Leaf Creek where 15-20 feet of main was exposed above the streambed.

**Finding:**

Staff has documented that no pipeline markers were located on either side of Green Leaf Creek as required.

2. **WAC 480-93-188(5) Gas Survey Records**

- (5) *Each gas pipeline company must keep leak survey records for a minimum of five years. At a minimum, survey records must contain the following information:*
- (a) *Description of the system and area surveyed (including maps and leak survey logs);*
- (b) *Survey results;*
- (c) *Survey method;*
- (d) *Name of the person who performed the survey;*
- (e) *Survey dates; and*
- (f) *Instrument tracking or identification number.*

**Charge:**

NWN did not record the instrument S/N as required in (f).

**Finding:**

Staff has documents that show no instrument number was recorded on example gas survey records.

## AREAS OF CONCERN

1. No "location specific" emergency plan was provided for review at The Dalles office. The emergency plan presented did not show The Dalles office current location or where personnel should gather in the event of an emergency. The presented emergency manual had two 'examples' of emergency maps but no emergency map showing The Dalles office.