

## Woodard, Marina (UTC)

---

**From:** Beach, Tina [Tina.Beach@cngc.com]  
**Sent:** Wednesday, October 20, 2010 8:30 PM  
**To:** Woodard, Marina (UTC)  
**Cc:** Kessie, Steve; Clapp, Mike; Grant, Sam  
**Subject:** Response to Docket PG - 100018  
**Attachments:** Response to Docket PG-100018.pdf; Report for WUTC.docx

**RECEIVED**  
OCT 20 2010  
WUTC  
Pipeline Safety Division

Dear Marina;

Please find the attached response to Docket PG-100018 Lamb Weston Inspection and attached Exhibit Report A. I would hope that the inspectors feel comfortable to call and discuss if we are not clear enough or if I've misunderstood any of the probable violations or areas of concern. Thanks for your time in processing this response.

Sincerely,

*Tina R. Beach*

Pipeline Safety Specialist



8113 Grandridge Blvd.  
Kennewick, WA 99336  
(509) 734-4576 Kennewick office  
(206) 445-4121 Work cell  
(509) 737-9803 Fax  
(406) 939-2240 Home cell  
[tina.beach@cngc.com](mailto:tina.beach@cngc.com)





8113 W. Grandridge Blvd., Kennewick, WASHINGTON 99336-7166 (509) 734-4576  
FACSIMILE (509) 737-9803

October 18, 2010

David Lykken  
Director of Pipeline Safety Program  
State of Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Dr. SW  
P.O. Box 47250  
Olympia, WA 98504-7250

RECEIVED

OCT 20 2010

WUTC  
Pipeline Safety Division

Subject: Response to Docket PG-100018

Dear Mr. Lykken;

This letter is intended to address your Notices of Probable Violation and Area of Concerns resulting from the inspection of the (Basin Foods) Lamb Weston line conducted by your inspectors, Mr. Vinsel and Ms. Johnson, during the periods of May 25<sup>th</sup> and May 26<sup>th</sup> in Moses Lake, WA.

The following is in response to the five citations noted by your inspectors as probable violations:

**1. 49 CFR 192.605 Procedural manual for operations, maintenance, and emergencies.**

- (a) *General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year.*

**Finding:**

The detailed operating procedure for Basin Frozen Foods #CP 640A (Lamb Westin/BSW) was not included in the 2010 Cascade Natural Gas Maintenance Manual (office copy) nor did it appear in the index of the manual.

**Cascade Response**

The code requires that a detailed operating procedure for Basin Frozen Foods be filed with the commission forty five days prior to the operation of any gas pipeline. In addition, it requires that each gas pipeline company file revisions to the procedure with the commissions annually. WUTC noted that they had received Basin Frozen Foods CP#640A dated September 10, 2003. WUTC referenced this procedure during the inspection and questioned why the cp had not changed since Basin Frozen Foods company name had changed. Although the name of the facility had changed twice since we took over operation, the CP was not changed because the

facility is known in the community and the company as Basin Frozen Foods. Furthermore, the operating conditions had not changed.

Cascade Natural Gas Corporation (CNGC) does acknowledge that we did send WUTC a completely new version of our O&M manual in 2006 and CP #640A was omitted. This is mainly due to the fact that this CP only applies to one district, who continued to operate the line as specified in CP #640A. Cascade doesn't believe this is a violation since we were in compliance when we took operation of the pipeline and nothing had changed related to the operating conditions since then.

**2. 49 CFR 192.605 Procedural manual for operations, maintenance, and emergencies.**

- (a) *General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year.*

**Finding(s):**

No evidence was presented to show that the detailed operating procedure for Basin Frozen Foods #CP 640A (Lamb Westin/BSW) was reviewed each calendar year from 2004-2009.

**Cascade Response**

We do have records demonstrating a review of our O&M manual in 2007, 2008, and 2009, see attached exhibit (a). The September 10, 2003 version of the procedure was found acceptable during those reviews. We do not update the version date of a procedure unless we publish another version. Records prior to 2007 were not retained.

**3. 49 CFR 192.605 Procedural manual for operations, maintenance, and emergencies.**

- (a) *General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year.*

**Finding(s):**

CNG did not update the procedure CP 640A to show that the point of custody change had moved upstream (year unknown) and eliminated a regulator and a meter downstream of R26. CNG no longer does maintenance on the regulator and the meter has been removed. Metering is done upstream at R46.

**Cascade Response**

We acknowledge that metering is upstream of R46, but since we took over operation of this pipeline the point of custody has never changed, we have never maintained the plant meter or regulator downstream of our regulators. Our procedures contain information pertaining to the equipment that we maintain, R46 and R26. The September 10, 2003 version does not designate that the plant regulator was Cascade's "responsibility". It does not specify maintenance requirements. It does not specify responsibilities or jurisdictions. The only thing about that piping it mentions is that you might need to use that equipment to isolate and restart the pipeline. The procedure covers start-up, blowdown, shutdown, and abnormal conditions requirements for the pipeline.

During the inspection when Staff told us they thought that the procedure meant that we had jurisdiction over that piping, we told them that we did not. Since the procedure was unclear, we offered to update our procedure to make this clear. Your staff agreed that was appropriate and we issued a new version of the procedure on May 26, 2010.

**4. 49 CFR 192.709 Transmission Lines: Record keeping.**

*Each operator shall maintain the following records for transmission line for the periods specified:*

*(c) A record of each patrol, survey, inspection, and test required by subparts L and M of this part must be retained for 5 years or until the next patrol, survey, inspection or rest is completed, whichever is longer.*

**Finding(s):** No evidence was presented to show that the yearly valve maintenance for the valve located in the Lamb Weston parking lot was performed yearly as required.

**Cascade Response**

The valve in question is not necessary for operation in an emergency. It has not been maintained because it was not designated for maintenance. There are sufficient shut-off valves installed on the system for which Cascade provided records. This valve is not needed for compliance with 192.179 or 192.615. Cascade did discuss this issue with WUTC inspectors during the audit and it appeared everyone was in agreement with the preceding statements at that time.

**5. 49 CFR 192.745 Valve Maintenance: Transmission Lines.**

*(a) Each transmission line valve that might be required during any emergency must be inspected and partially operated at intervals not exceeding 15 months, but at least once a calendar year.*

**Finding(s):** No evidence was presented to show that the yearly valve maintenance for the valve located in the Lamb Weston parking lot was performed yearly as required.

**Cascade Response**

See response to item 4.

The following is in response to the area of concern noted by your inspectors:

**AOC #1:**

During the inspection staff reviewed a number of CNG's Controlled Procedures (CP's) and found that references to sections in many procedures were not updated when the procedure was revised.

- a) For CP 715 – Dated June 28<sup>th</sup>, 2010
  - i) Section .063 'Log of instrument accuracy tests as stated in section .07 Records (Should be .08 Records)
  - ii) Section .066 after c. states 'Section .07 provides instructions for completing forms' (Should be .08 Records)
  
- b) For CP 745 – Dated June 6<sup>th</sup>, 2010
  - i) References to the test tree see section (.16) should be updated to show that the test tree is now in section .17.
  - ii) References cite (.173) for where to go when a device is found to have insufficient capacity. Section .173 no longer exists in CP 745; I believe this should refer to Section .183.

**Cascade Response**

These appear to be cross references that were neglected during the last updates. We have updated these procedures on our electronic copies to the show the correct cross references.

Please consider the comments above when deciding resolution in these matters. We believe we have satisfied the requirements of WAC 480-93-180; 49 CFR 192.605, 49 CFR 192.709, and 49 CFR 192.745. If you are not satisfied that we have sufficiently addressed, or correctly responded to the citations, please contact me or allow us the opportunity to discuss this response further.

Sincerely,  
Cascade Natural Gas Corporation



Tim Clark  
Vice President of Operations

**Subject**

**Date**

**Page 5 of 5**

---

**Cc:** Steve Kessie  
Tina Beach  
Mike Clapp  
Sam Grant



## Report for WUTC-Exhibit A

**Project Name:** O & M Review

**Department:** Safety and Compliance

**Focus Area:** Review Regulations for Compliance with Procedures.

**Product/Process:** Various staff assigned to review Code with Company Procedures.

**Prepared By** Tina Beach-Exhibit A-Docket PG-100018

Document Owner(s)	Project/Organization Role
Keith Meissner-2007	Review of O & M
Keith Meissner-2008	Review of O & M
Keith Meissner-2009	Review of O & M

### Project Closure Report Version Control

Version	Dates	Author	Review O & M Description
2007	September	Keith Meissner	CP 607.09, 630, 635, 680.06, 740, 745.02, 900, 925.
	September	Sam Hicks/Joe Maxwell	CP 604.02, 604.3, 720.026, 740.01, 754.043, 755.04, 780.072.
	September	Bill Danko	CP 760.05, 760.04, 760.07.
	September	John Schrier	CP 760
	September	Kevin Raschkow	CP 601.22, 625, 745.

Project Closure Report

2008	April	Keith Meissner	CP 500, 503, 647, 715, 730, 750, 754, 760, 835, 860.
	May	Kevin Raschkow	CP 680
	May	Dan Meredith	CP 925
	May	Lanny Wilkin	CP 685
2009	April	Stacy Grano	CP 545, 695, 815,900,910.
	April	Bob Harris	CP 72-A, 72-D.
	April	Debbie Banry	CP 225, 226, 775,
	April	Lanny Wilkin	CP 505, 510, 525, 535,540, 684, 685, 747, 756.
	April	Kevin Raschkow	CP 600, 601, 602, 603,604, 605, 607, 609, 615, 620,622,625,635,640,642,643,645,646,647,665, 670,675,677,680,700,705,710,735,755,766,790, 818,860,865,869,870,880,881.
	April	Ryan Pierce	CP 90
	April	Chris Robbins	CP 515
	April	Bill Danko	CP 630, 760, 816, 830.
	April	Dan Meredith	CP 925
	April	Keith Meissner	CP 87, 88, 89, 223, 500, 503, 550, 610, 636, 686, 714, 715, 716, 720, 724, 725, 730740, 742, 745, 750, 754, 780, 817, 819, 835, 895, 911.

**Note:** Excel spreadsheet was utilized in 2007  
Excel spreadsheet was utilized in 2008  
Excel spreadsheet was utilized in 2009