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September 28, 2009

Ms. Anne Soiza  
Pipeline Safety Director  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Dr. S.W. P.O. Box 47250  
Olympia, WA 98504-7250

STATE OF WASH  
UTILITY TRAINING  
COMMISSION  
2009 OCT -2 AM 8:13  
PROGRAM MANAGER

Reference: August 2009 Inspection – Docket PG-090031

Dear Ms. Soiza:

This letter is in response to the WUTC “2009 Inland Empire Paper Company Standard Inspection”; the inspection was conducted in August and the WUTC report was dated September 3<sup>rd</sup>, 2009.

In the report, the WUTC identified one item for Inland Empire Paper Company (IEP) to address. “WAC 480-93-115(2), casing of pipelines” states that test lead wires must be attached to each casing without vents, and to the steel gas pipeline to verify that no electric short exists between the two”. In 2005, IEP relocated a portion of our gas line and installed two casings where the gas line crossed under our railroad tracks. We did install vents on the casings, but did not install test lead wires on the pipeline. IEP’s pipeline is a short 3.5 mile line that is very well cathodically protected with four sets of tests leads. We do have test leads on the pipeline less than 250 feet away from the west casing and another set of test leads approximately 1000 feet away from the east casing. Although the WAC rule does not state how close the test lead wires need to be installed, the WUTC has determined that our existing test leads do not satisfy its interpretation of the WAC rule.

IEP will install test lead wires on its gas pipeline next to both the east and west casings that run under the railroad tracks. IEP will complete this work by November 30<sup>th</sup>, 2009.

IEP has owned and operated its natural gas line since 1989 and has never had a failure, accident, or recordable incident. Through many years of inspections, IEP has always complied with the requests, guidance, and requirements of the WUTC in a directed and timely manner. IEP will continue to work cooperatively with the WUTC to operate and maintain its pipeline in the safest possible manner.

If you have any questions, please contact me at 509-924-1911.

Sincerely,

Kevin Davis  
Production Manager