



STATE OF WASHINGTON
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
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CERTIFIED MAIL

August 15, 2013

The Honorable Pat Johnson
Mayor
City of Buckley
933 Main Street
PO Box 1960
Buckley, WA 98321

Dear Mayor Johnson:

RE: 2011 Docket 110039 Follow-up Natural Gas Inspection – City of Buckley, Washington

Staff from the Washington Utilities and Transportation Commission (staff) conducted a follow-up natural gas distribution inspection on July 30, 2013 of the City of Buckley's pipeline system. The inspection consisted of a follow-up records review.

Our inspection indicates 1 probable violation as noted in the enclosed report.

Our decision on next steps

We have decided to seek an agreed order that will include conditions necessary to resolve the probable violation noted in our inspection. For us to take this action, the terms and conditions of the agreement must be agreed to by the City of Buckley. You will have the opportunity to work with us in drafting the agreement. The commission must approve any agreement between staff and the City of Buckley which may be done as a consent item at an open public meeting. If the City of Buckley does not agree to this course of action, we will pursue a complaint with penalty.

We have attached an outline of the terms and conditions which contains language for the probable violation identified in our inspection report. Once we reach agreement on the wording of the conditions, we can begin drafting a proposed order.

Your response is needed.

Please review this letter carefully and respond in writing by August 30, 2013 as to whether the City of Buckley agrees to enter an agreement to close this docket. Such an agreement will resolve the probable violation.



DRAFT AGREEMENT CONDITIONS

The City of Buckley will develop:

- A process to review the service cards and quarter section maps to identify all the missing data in mapping records.
- A process for updating missing data found during your review.
- A process for updating the mapping system to ensure new construction is included on all mapping records.
- A Quality Control and Quality Assurance (QA/QC) procedure to verify the integrity of the mapping system.

The City of Buckley will complete these items within 60 days and send notice of completion to the Commission.

If you have any questions, or if we may be of any assistance, please contact Dave Cullom at (360) 664-1141.

Sincerely,



David D. Lykken
Pipeline Safety Director

cc: David Schmidt, City Administrator

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
2013 Intrastate Natural Gas Follow-up Inspection Report
City of Buckley Inspection
2011 Docket No. PG-110039

Probable violations

The following probable violation of WAC 480-93 was noted as a result of the 2013 inspection of the City of Buckley's gas distribution system. The inspection was a follow-up of non-compliance issues resulting from a 2011 standard natural gas audit.

1. **WAC 480-93-018 Records.**
 - (5) *Each gas pipeline company must update its records within six months of when it completes any construction activity and make such records available to appropriate company operations personnel.*

Finding(s):

1. We spot checked several new construction projects and could not find service cards and the associated map drawings for 889 or 849 Lund. It is unknown how many services have not been mapped in the past several years.
2. The mapping changes from redlining in the field or changes on service cards are not currently being updated on the quarter section drawings.