



City of Buckley

P.O. Box 1960 • Buckley, WA 98321 • (360) 829-1921 ext. 200

August 29, 2013

David D. Lykken
WUTC - Pipeline Safety Director
PO Box 47250
1300 S. Evergreen Park Dr. S.W.
Olympia, WA 98504-7250

2013 AUG 30 AM 9:18

SUBJECT: Response to Follow-up Natural Gas Inspection - 2011 Docket #11003

Dear Mr. Lykken:

Thank you for providing the recent inspection report listing the probable violation related to the follow-up inspection of the City's gas distribution system conducted by pipeline safety staff on July 30, 2013. The City has reviewed the potential violation and is providing the following information as clarification to what was observed during the inspection:

Probable Violation:

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.

City Response: *The City disagrees with both of the findings stated above and hopes to offer clarification to support our argument.*

Finding #1 indicates that the City had not completed service cards for two addresses located within the "new" Elk Heights subdivision and as a result a further assumption was made that because these two had not been done that there could be many more out there. This is not accurate and the City's gas lead told the inspector that the service cards for these two addresses had been completed, but couldn't locate them. It has since been confirmed that the service cards for the Elk Heights addresses had been pulled from the file and were being used to make a separate "individual" map for the subdivision. The service cards have been found and are available for inspection.

As the finding indicates the inspector "spot checked several new construction projects" but the two addresses referenced above were the "only" two that couldn't be located. While it is true that the cards were temporarily missing, the lead operator was new with less than a year in the position and this was his 1st inspection.

Finding #2 states that "the mapping changes from redlining in the field or changes on service cards are not currently being updated on the quarter section drawings." The City disagrees with this finding as it does not accurately reflect the mapping practices of the City. To our knowledge the inspector never checked to see whether or not our quarter sections maps were being updated

The facts are that with the exception of 7-8 new services, 100% of all mains and services have been redlined on quarter section maps and more than 50% have been field verified. The field verified information has been turned over to the City Engineer who has taken this information and updated the City's quadrant maps. The City Engineer has been actively updating the maps on an ongoing basis. As of the date of this response the City Engineer confirmed that 27 of 62 or 44% of the City's quarter sections have been updated and returned back to the City for use.

Conclusion: As to finding #1, the City is willing to agree that two service cards were temporarily misplaced; however, we don't believe this is a significant enough error to warrant the finding that City's entire records system is in question. As to finding #2, the City has always actively pursued the updating of its quarter maps and there is no basis for a finding that it does not.

However, we recognize that improvements to current operations "only" improves our ability to "provide natural gas and operate the system in a manner that maximizes safety and service to its customers" and we are therefore willing to implement new procedures that will hopefully enhance our ability.

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.**

The City of Buckley Gas Department will make it a goal to weekly review a minimum of 10 gas service map cards and cross reference them with the City's quarter section base maps to ensure accuracy and consistency.

This process will be accomplished by starting at the top of the account list, pulling the service map card, cross checking the service card with the quarter section map (verifying that both maps are the same), and updating any information onto the service map cards.

After the service map has been updated, staff will write the quarter section map number on the card in red ink verifying that it has been updated.

- **A process for updating the mapping system to ensure new construction is included on all mapping records.**

The City of Buckley Gas Department will update both gas service map cards and the quarter section maps within 30 days of completion of a gas service work order. When new gas mains are installed the City's quarter section maps will be updated within 6 months of completion.

- **A Quality Control and Quality Assurance (QA/QC) procedure to verify the integrity of the mapping system.**

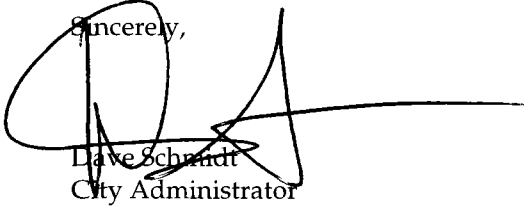
The City of Buckley Gas Department will make it a goal to weekly pull (5) random gas service map

cards, locate them in the field to verify for accuracy, cross check the service cards with the quarter section maps and make the necessary changes to both maps.

When this process is done, the finished account will be logged onto an audit sheet signed by either the Public Works supervisor or the Public Works Utility lead verifying that the above process has been done.

The City appreciates the knowledge, expertise, cooperation and assistance of the safety inspector(s) during the latest follow-up inspection. Our goal is to "provide natural gas and operate the system in a manner that maximizes safety and service to its customers. If I can provide further information or clarify this response in any way, please feel free to contact me at Buckley City Hall (360) 829-1921 ext. 7802. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Dave Schmidt", with a long horizontal line extending to the right.

Dave Schmidt
City Administrator

Cc: Pat Johnson, Mayor
Phil Olbrechts, City Attorney
Dominic Miller, City Engineer
City Council

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 Company **WA UTILITIES & TRANSPORTATION**
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 City **OLYMPIA** State **WA** ZIP **98504-0001**

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 Company **City of Buckley**
 Address **933 Main Street**
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 Sender (Not in Section 1 will be billed) **Recipient** **Third Party** **Credit Card** **Cash/Check**
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 Credit Card No. _____

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