

CERTIFIED MAIL

April 6, 2006

Chris Searcy, P.E.
Public Works Director
City of Enumclaw
1339 Griffin Avenue
Enumclaw, WA 98022

Dear Mr. Searcy:

Subject: 2006 Enumclaw Specialized Inspection

Thank you for your letter of March 8 concerning our (pipeline safety staff) specialized inspection of Enumclaw's natural gas system conducted in January. Your information has helped clear up one of our concerns. However, we believe there are four probable violations which constitute a public safety risk and may justify pursuit of a complaint. Attached is our inspection report.

The inspection included a review of probable violations noted in past standard inspections from 1999, 2000, 2002 and 2004. We also performed a field verification of your Operator Qualification (OQ) program. We found four probable violations of federal and state pipeline safety regulations - two of these violations involve improperly installed regulators and over-pressure protection devices vents which affect Enumclaw's over-pressure protection. We have also listed two areas of concern which may lead to probable violations if the issues are not properly addressed by Enumclaw. These findings illustrate our position based on the January inspection and consideration of your March letter.

As we have discussed previously, your system's historic pattern of probable violations is of great concern to the pipeline safety program. Because Enumclaw relies on personnel who are responsible for a wide range of public works activities, accurate and up-to-date procedures are essential to ensure your staff have the guidance to operate the pipeline in accordance with safety protocols. These regulations have changed significantly over the past several years but they remain only the minimum safety standards (49 CFR 192.1) that apply to gas transportation systems.

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Given our previous history of attempting to resolve these concerns and based on our findings in this specialized inspection, we are considering asking the commission to issue a complaint against Enumclaw. If the commission decides to issue a complaint, they may seek monetary penalties, changes to Enumclaw's practices or other relief justified by the circumstance. If a complaint is issued, Enumclaw will have the opportunity to present its position on the merits of the allegations involved. As of this date, the commission has not been asked to make a decision. The probable violations listed on the following pages are staff's position, not the commission's.

We expect Enumclaw to address each of the issues referenced in the attached list of probable violations. These items will be reviewed in a follow-up inspection. You will also be notified of any decision the commission makes on how to proceed related to these items.

If you have any questions, please contact Patti Johnson Pipeline Safety Engineer, at (360) 664-1266. In any future correspondence regarding this inspection, please refer to docket number PG-051609.

Sincerely,

Alan E. Rathbun
Pipeline Safety Director

cc: Jim Flisrand

Enclosure